

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

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| IN RE: |) | |
| |) | |
| APPLICATION OF AIR VOICE |) | DOCKET NO. _____ |
| WIRELESS LLC d/b/a FEELSAFE |) | |
| WIRELESS FOR DESIGNATION AS AN |) | |
| ELIGIBLE TELECOMMUNICATIONS |) | |
| CARRIER IN THE STATE OF SOUTH |) | |
| CAROLINA |) | |

I. INTRODUCTION

Air Voice Limited Liability Company ("Air Voice" or the "Company"), by and through its undersigned counsel, and pursuant to Section 214(e) of the Federal Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214(e), the implementing rules of the Federal Communications Commission ("FCC"), S.C. Code § 58-11-100, 26 S.C. Code Regs. 103-690 (Supp. 2011) requests designation throughout its service area in South Carolina. Air Voice is a limited liability company organized in the State of Michigan with its principal offices located at 2425 Franklin Road, Bloomfield Hills, MI 48302. The Company's Articles of Organization are attached hereto as **Exhibit "A."** Air Voice attaches as **Exhibit "B"** a current list of its officers, along with biographical information for each, showing that it has the expertise necessary to provide the services specified herein.

Air Voice is a provider of commercial mobile radio service ("CMRS") throughout the United States. Air Voice provides prepaid wireless telecommunications services to consumers by using the AT&T Wireless ("AT&T") network on a wholesale basis. Air Voice obtains from AT&T the network infrastructure and wireless transmission facilities to allow the Company to operate as a Mobile Virtual Network Operator ("MVNO"). The extended AT&T footprint allows

Air Voice to provide expanded coverage throughout otherwise underserved markets. Air Voice has developed and implemented a network that delivers all of the services required by the federal Lifeline guidelines, and employs the AT&T carrier network to ensure ubiquitous coverage. A list of wire centers to be served by Air Voice is attached as **Exhibit "C."**

Air Voice is not a rural telephone company as defined in Section 153(37) of the Act (47 U.S.C. § 153(37)). Accordingly, the Company is required to describe the geographic area(s) within which it requests designation as an ETC. Air Voice requests ETC designation in all exchanges where its underlying carrier, AT&T, has coverage. Air Voice understands that its service area overlaps with rural carriers in South Carolina, but maintains that the public interest factors described herein justify its designation in these carriers' service areas, especially because it seeks ETC designation solely to utilize USF funding to provide Lifeline service to qualified low-income consumers. Therefore, its designation as an ETC will cause no growth in the high-cost portions of the USF and will not erode high cost support from any rural telephone company. In fact, the FCC has determined that "[d]esignation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."

Air Voice has been designated as an ETC in Michigan, Kentucky, Wisconsin, Pennsylvania, and Ohio. Air Voice currently has applications for ETC designation pending with, Indiana, Mississippi, Oklahoma, California, and is awaiting designation as an ETC by the FCC for the states of Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, Texas and Virginia; no such petitions have been denied. Air Voice has never been denied ETC designation on its merits by any state commission or by the FCC in connection with any state.

Air Voice respectfully requests that the Public Service Commission (“the Commission”) grant this Application and that it do so expeditiously so that Air Voice may begin providing wireless Lifeline service to qualified low-income households at the earliest practicable time.

Correspondence or communications pertaining to this Application should be directed to Air Voice’s attorney of record:

Charles L.A. Terreni
Terreni Law Firm, LLC
1508 Lady Street
Columbia, South Carolina 29201
Telephone (803) 771-7228
Facsimile (803) 771-8228
Email: charles.terreni@terrenilaw.com

Questions concerning the ongoing operations of Air Voice following certification should be directed to:

Jim Bahri, CEO
Air Voice Wireless, LLC
2425 Franklin Road
Bloomfield Hills, MI 48302

II. UNIVERSAL SERVICE OFFERING

A. Proposed Lifeline Offering

Air Voice's prepaid wireless services are affordable, easy-to-use, and attractive to low-income and lower-volume consumers. The Company's wireless service provides them with access to emergency services and a reliable means of communication that can be used both at home and while traveling to remain in touch with friends and family, as well as for contacting prospective employers. Doing business as FeelSafe Wireless, Air Voice offers simple, prepaid

calling plans, a variety of additional features, basic easy-to-use handsets, upgraded full-feature handsets and high-quality customer service.

Air Voice has established itself as a leader in the non-Lifeline prepaid market and intends to be a leader in the Lifeline prepaid marketplace by offering Lifeline consumers the same exceptional value that it offers to its non-Lifeline customers. Given its pricing and marketing strategy and the demographics of other similar MVNOs' customers, Air Voice anticipates that many of its customers will be from low-income backgrounds and will not previously have enjoyed access to wireless service because of economic constraints, poor credit history, or sporadic employment.

Air Voice does not conduct credit checks or require customers to enter into long-term service contracts as a prerequisite to obtaining wireless service. By providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them, or who were previously ignored by traditional carriers, Air Voice will expand the availability of wireless services to many more consumers, which is the principal reason that Congress created the universal service program.

Air Voice has the ability to provide all services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC's Rules (47 C.F.R. § 54.101(a)) throughout South Carolina. The Company's Lifeline service offering will provide customers with the same features and functionalities enjoyed by all other Air Voice prepaid customers, with one notable exception: prepaid Lifeline services will not require payment of an out-of-pocket fee by subscribers, but instead, Air Voice will receive support from the Lifeline program as compensation for providing those services.

Under Air Voice's proposed low-income wireless offering, each eligible wireless customer will receive a 911-compliant handset at no cost to the subscriber. Attached hereto as **Exhibit "E"** is information regarding the handsets currently being issued by Air Voice to its customers (depending on availability, Air Voice may issue other handsets with comparable features to customers in the future). Wireless handsets will be delivered at no charge to qualifying customers, service will be activated, and the requisite number of minutes will be added upon certification of the customer for Lifeline.

As summarized in **Exhibit D**, the Company's proposed Lifeline rate plan includes a free phone and 250 free voice minutes each month. Unused minutes expire at the end of the last day of their cycle. The account is then automatically replenished with the next month's 250 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes billed at \$.10 per minute. Subscribers may also purchase an additional 250 minutes for \$20.00.

This plan includes nationwide coverage and access to voice mail, call waiting, three-way calling, call forwarding and Caller ID features at no cost. There is no additional charge for toll calls or calls to Air Voice customer care. Calls to 911 are free, regardless of service activation or availability of minutes. Lifeline customers also have the option, for an additional fee, to purchase the text and data plans that are available to all Air Voice customers. Air Voice's prepaid offering will be an attractive alternative for consumers who need the mobility, security, and convenience of a wireless phone, but who are concerned about usage charges or long-term contracts.

All low-income universal service support will be used to allow Air Voice to provide the service with no monthly recurring charge, thus ensuring that consumers receive the full benefit

of the universal service support funding for which Air Voice will seek reimbursement. Furthermore, Air Voice will provide Lifeline customers a company-funded \$3.50 credit, as long as this requirement remains in effect for South Carolina Lifeline ETCs. Therefore, together, the state and federal credits offered in South Carolina will be at least \$12.75.

B. Plan Enrollment

Consumers will be signed up in person through retail agents or directed, via company literature, collateral or advertising, to a toll-free telephone number and to the Company's website. The website will contain a link to information regarding the Company's Lifeline service plans, including a detailed description of the benefit and the program and income eligibility criteria. Air Voice will have direct contact with all customers applying for Lifeline service, either in person through its employees, agents or representatives, the Company's website, FeelSafeWireless.com, the telephone (including facsimile) or mail.

Air Voice will provide Lifeline-specific training to all personnel, whether employees, agents or representatives at authorized locations, who interact with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services. Air Voice understands and acknowledges its responsibility for the acts and omissions of its employees, agents and representatives. As such, Air Voice will only enroll applicants at retail locations at which Air Voice has an agency agreement with the retailer. Air Voice will require all agent retailers to have all employees responsible for lifeline enrollment complete the standard Air Voice representative training.

C. Prevention of Fraud, Waste and Abuse

Air Voice will comply with the uniform eligibility criteria established in new section 54.409 of the FCC Rules¹ and 26 S.C. Code Regs. 103-690.1(E)(a)(4). Subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; (2) the household's participation in one of the federal assistance programs listed in new section 54.409(a)(2); or (3) meeting eligibility criteria established by South Carolina for its residents, provided such criteria are based solely on income or factors directly related to income per new section 54.409(a)(3) of the FCC Rules.

In addition, the Company will confirm that the subscriber is not already receiving a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service. Air Voice will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.² Consistent with federal requirements, Air Voice requires customers to certify at the time of service activation and annually thereafter that they:

- 1) are the head of household;
- 2) participate in one of the state-approved means tested programs;
- 3) will be receiving Lifeline-supported services only from Air Voice;
- 4) do not currently receive Lifeline support; and
- 5) will notify Air Voice in the event that they no longer participate in the qualifying program.

¹ 47 C.F.R. § 54.409 (effective June 1, 2012).

² Lifeline Reform Order at ¶61; 47 C.F.R. § 54.410(a).

Air Voice's certification form will also require all consumers, at sign-up and annually thereafter, to provide the information and certifications, under penalty of perjury, required by revised CFR § 54.410(d).7. See **Exhibit G** to the Company's FCC-Approved Compliance Plan (“the Compliance Plan”) for more detailed enrollment information. Air Voice will annually re-certify the continued eligibility of all of its subscribers.

The certification forms, a sample of which is attached as Exhibit A to the Compliance Plan, will also explain in clear, easily understandable language that:

- 1) Lifeline is a federal benefit;
- 2) Lifeline service is available for only one line per household;
- 3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses;
- 4) households are not permitted to receive benefits from multiple providers;
- 5) that violation of the one-per-household requirement would constitute a violation of the FCC's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government; and
- 6) a Lifeline subscriber may not transfer his or her service to any other individual, including another eligible low-income consumer.

If Air Voice has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, the Company will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.³ A demonstration of eligibility must comply with the annual verification procedures found in Section 54.410(f), including the submission of a certification form.⁴

³ Lifeline Reform Order at ¶ 143; 47 C.F.R. § 54.405(e)(1).

⁴ 47 C.F.R. § 54.410 (effective April 2, 2012).

Furthermore, Air Voice commits to comply with the FCC's 60-day non-usage policy, as described in the Lifeline Reform Order.⁵ The Company has implemented the following 60-day non-usage policy in an effort to avoid waste, fraud, and abuse of the program. If no usage appears on an Air Voice Lifeline customer's account during any continuous 60-day period, Air Voice will promptly notify the customer that the customer is no longer eligible for Air Voice Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer's account will remain active, but Air Voice will engage in outreach efforts to determine whether the customer desires to retain the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, sending a text message and/or adding money to the account), Air Voice will deactivate Lifeline services for that customer. In addition, Air Voice will not seek to recover a USF subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service.

To further protect the integrity of the USF, Air Voice has contracted with CGM, LLC of Roswell, Georgia, a lifeline service bureau, to edit all subsidy request data. CGM will process and validate the Company's subsidy data to prevent: (1) Duplicate Same-Month Lifeline Subsidies (Double Dip): any name/address that is already receiving a lifeline subsidy from the Company will be automatically prevented from receiving a second lifeline subsidy in that same month; and (2) Inactive lines receiving subsidy: CGM's systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines. Through the processes described above, Air Voice ensures that it does not over-request from support funds.

⁵ Lifeline Reform Order at ¶¶ 257-63.

III. THE COMMISSION HAS JURISDICTION TO DESIGNATE WIRELESS ETCs

Section 214(e)(2) of the Communications Act authorizes state commissions such as the Public Service Commission of South Carolina to designate ETC status for federal universal service purposes.⁶ The FCC has further ruled that Section 214(e)(2) “provides state commissions with the primary responsibility for designating ETCs.”⁷

The FCC has promulgated rules governing ETC designations, set forth at 47 C.F.R. § 54.101, §§ 54.201-203, and §§ 54.205-207 (the “FCC Rules”) to establish various requirements for carriers to obtain ETC status. Applicants seeking ETC status in South Carolina must address and satisfy each of the ETC designation criteria under the FCC Rules and 26 S.C. Code Regs. 103-690.

IV. AIR VOICE SATISFIES THE REQUIREMENTS FOR ETC DESIGNATION

1. As demonstrated herein, Air Voice meets the requirements for ETC designation by the Commission pursuant to Section 214(e)(2) of the Act.⁸ In addition, Air Voice complies with the standards established by the FCC for determining whether applicants for ETC status serve the public interest.⁹ The FCC has determined that applications for ETC status in “non-rural” areas are *per se* in the public interest.¹⁰

⁶ 47 U.S.C.A. § 214(e)(2). See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd 8776, 8858-59 (¶ 145) (1997). (*Universal Service First Report & Order*).

⁷ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 20 FCC Rcd 6371, 6372 (¶ 1, n. 2) (2005) (“*ETC Criteria Order*”); see also 26 S.C. Code Regs. § 103-690 and 103-690.1.

⁸ 47 U.S.C. § 214(e)(2).

⁹ See *Federal-State Joint Board on Universal Service*, *Report and Order*, CC Docket No. 96-45, 20 FCC Rcd 6371, ¶ 40-43 (Rel. March 17, 2005).

¹⁰ *Federal-State Joint Board on Universal Service*; *Cellco Partnership d/b/a Bell Atlantic Mobile* Petition for Designation as an Eligible Telecommunications Carrier, *Memorandum Opinion and Order*, CC Docket No. 96-45, 16 FCC Rcd 39, 45; -U 14 (Rel. Dec. 26, 2000) (hereinafter “*Cellco Partnership*”) (“For those areas served by non-rural telephone companies, such as the state of Delaware, we believe that designation of an additional ETC based upon a demonstration that the requesting carrier complies with the statutory eligibility obligations of

2. The Commission has jurisdiction to designate Air Voice as an ETC. Pursuant to the provisions of Section 214(e)(2) of the Act, state commissions, such as this Commission, have primary responsibility for the designation of eligible telecommunications carriers under Section 214(e)(2). As shown in this Application, Air Voice meets the requirements for designation as an ETC in South Carolina. The Commission may and should grant Air Voice's application for ETC status.

3. Air Voice has the financial and technical capability to provide Lifeline service. As part of the Lifeline Reform Order, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.¹¹ Air Voice satisfies these criteria as evidenced by the financial statements attached as **Exhibit "F."**

4. Air Voice has been offering Lifeline service to customers since April 2013. Air Voice also offers several other telecommunication services in addition to its Lifeline service. In sum, Air Voice has access to sufficient funds to run its business and is not solely dependent on reimbursements from the Fund. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

5. A current list of its officers, along with biographical information for each, showing that it has the expertise necessary to provide the services specified herein is attached as **Exhibit "B."**

section 214(e)(1) is *consistent per se with the public interest*. The carrier need make *no further showing* to satisfy this requirement.") (emphasis added).

¹¹ In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb 6 2012) ("Lifeline Reform Order").

6. Air Voice will offer all required services and functionalities. Section 214(e)(1)(A) of the Act¹² requires an ETC to offer the services that are supported by federal universal service support mechanisms under section 254(c). Effective December 29, 2011, pursuant to the USF/ICC Transformation Order¹³, as further clarified by the USF/ICC Order on Reconsideration¹⁴, the FCC eliminated its former list of nine supported services and amended section 54.101(a) of its rules to specify that “voice telephony service” is supported by the federal universal service mechanisms. The amended Section 54.101(a) and its list of supported services reads as follows:

§ 54.101 Supported services for rural, insular and high cost areas.

(a) Services designated for support. Voice telephony service shall be supported by federal universal service support mechanisms. The functionalities of eligible voice telephony services include voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation for qualifying low-income consumers (as described in subpart E of this part).

7. Upon designation as an ETC in South Carolina, and consistent with state and federal policies favoring universal service, Air Voice will offer voice telephony services as

¹² 47 U.S.C. § 214(e)(1).

¹³ In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“USF/ICC Transformation Order”).

¹⁴ In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (“USF/ICC Order on Reconsideration”).

described in the amended Section 54.101 of the FCC Rules.¹⁵ To the extent that the Commission continues to require ETCs to provide those services supported by federal universal service support mechanisms previously enumerated in 47 C.F.R. § 54.101(a), Air Voice commits to continue to satisfy state voice service requirements.¹⁶

8. The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and enhanced 911 (“E911”) where available, and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, the Company will comply with the Commission’s forbearance grant conditions relating to the provision of 911 and E911 services and handsets. Air Voice also commits to remit 911 revenues to local authorities. The Company commits to pay in a timely manner all applicable federal, state and local regulatory fees, including but not limited to universal service and E911 fees.¹⁷

9. Air Voice will not provide toll limitation service (“TLS”), which allows low-income consumers to avoid unexpected toll charges. However, since the Company is a prepaid service provider, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their minutes. Further, the Company, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for

¹⁵ 47 C.F.R. §§ 54.101(a).

¹⁶ USF/ICC Transformation Order at ¶ 82.

¹⁷ See TracFone Wireless, Inc. Petition to Rescind State 911/E911 Condition, FCC Docket No. 96-45 (May 3, 2010).

in advance. Pursuant to the Lifeline Reform Order, subscribers to such services are not considered to have voluntarily elected to receive TLS.¹⁸

10. Air Voice will provide wireless service through resale. Under Section 214(e)(1)(A) of the Act, an ETC must offer the services supported by federal universal service support mechanisms throughout its designated service area “either using its own facilities or a combination of its own facilities and resale of another carrier’s services.”¹⁹ In its Lifeline Reform Order, the FCC decided to forbear, on its own motion, from applying the facilities requirement of Section 214(e)(1)(A) to any telecommunications carrier that seeks limited ETC designation to participate in the Lifeline program, conditioned on the ETC’s compliance with certain 911 requirements and the ETC’s filing with and approval by the FCC of a compliance plan describing the ETC’s adherence to certain protections prescribed by the FCC (“Blanket Forbearance”).

11. Air Voice seeks limited ETC designation in South Carolina to participate in the Lifeline program and has opted to pursue Blanket Forbearance. Air Voice filed its Compliance Plan (“Compliance Plan”) with the FCC and it was approved on December 26, 2012. A copy of the Compliance Plan is attached hereto as **Exhibit “G.”**

12. Air Voice, in its provision of wireless services, will offer resold services which Air Voice will obtain from its underlying wireless provider, AT&T. This extended footprint allows Air Voice to provide expanded coverage throughout otherwise underserved markets.

13. Air Voice has developed and implemented a diverse network that delivers all of the services required by the federal Lifeline guidelines and ensures ubiquitous coverage.

¹⁸ Lifeline Reform Order at ¶ 230.

¹⁹ 47 U.S.C. § 214(e)(1)(A).

14. Through its service arrangements, Air Voice is able to offer all of the services and functionalities supported by the universal service program, as detailed in Section 54.101(a) of the FCC Rules, throughout its Service Area.

15. Air Voice will advertise the availability of the supported services. The FCC adopted specific requirements for Lifeline advertising in its Lifeline Reform Order with which the Company will comply.²⁰ Air Voice is fully prepared to and will comply with federal requirements that it advertise the availability of its services throughout its Service Area using media of general distribution.²¹ Air Voice further commits that it will also publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.²² Air Voice specifically targets its advertising so as to reach its intended market base of low-income consumers who otherwise would be without service, or unaware of the program's availability and benefits. Accordingly, more low-income South Carolina residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to Air Voice's service. A sample of Air Voice's planned advertising is attached hereto as **Exhibit "H."**

V. AIR VOICE WILL MEET THE COMMISSION'S ADDITIONAL REQUIREMENTS FOR DESIGNATION ESTABLISHED BY THE COMMISSION AND THE FCC'S REGULATIONS

The requirements for designation of ETCs were recently amended by the FCC. Effective April 2, 2012, 47 C.F.R. § 54.202 imposes a number of changed requirements in order to be designated an ETC under Section 214(e)(6). Air Voice will comply with the requirements of 47

²⁰ Lifeline Reform Order at ¶¶ 275-82.

²¹ 47 C.F.R. § 54.201(d)(2).

²² 47 C.F.R. §§ 54.405(b).

C.F.R. § 54.202, effective April 2, 2012, and will comply with the South Carolina requirements for initial designation pursuant to 26 S.C. Code Regs. 103-690 as illustrated below.

A. Commitment to Provide Service. 26 S.C. Code Regs. 103-690(C)(a)(1)(A)

Air Voice hereby makes a commitment to provide service throughout its proposed ETC designated service area to all customers who make a reasonable request for service. If Air Voice's network already passes or covers the potential customer's premises, Air Voice will provide service immediately. For those instances where a request comes from a potential customer within Applicant's proposed ETC Designated Area but outside its existing network coverage, Applicant will provide service within a reasonable period of time if service can be provided at a reasonable cost utilizing one or more of the following methods: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other equipment; (3) adjusting network or customer facilities; or (4) reselling services from another carrier's facilities to provide service.

Air Voice not only commits to provide service throughout its Service Area, but also to provide universal service in a timely manner to all customers who make a reasonable request for service pursuant to the FCC Rules.²³ If designated as a wireless ETC, Air Voice will provide service throughout its Service Area through a combination of its own facilities and the resale of services. Air Voice is willing to accept carrier of last resort obligations throughout the universal service areas in which Air Voice is designated as an ETC by the Commission.

²³ 47 C.F.R. § 54.202(a)(1) also requires the submission of a five-year plan demonstrating how high-cost universal service support will be used to improve the ETC's coverage, service quality and capacity. This requirement, however, is inapplicable to this application, since Air Voice is not seeking high-cost assistance.

B. Advertising and Outreach Program. 26 S.C. Code Regs. 103-690(C)(a)(1) (C) & (a)(7)

The Commission requires an applicant to submit a two-year plan that describes the carrier's plans for advertising and outreach programs for identifying, qualifying and enrolling eligible participants in the Lifeline program.

Air Voice further commits that it will also publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.²⁴ Over the next two years, Air Voice will advertise the availability and prices of its services through a variety of media including its using mediums for outreach that may include advertisements via newspapers, direct mail, event representation, radio and the internet, and its distribution network which includes a network of resellers as well as from FeelSafeWireless' website, www.FeelSafeWireless.com or and other online outlets.

Air Voice will provide retail outlets with signage to be displayed where company products are sold and with printed materials describing the lifeline program. Each state in which Air Voice operates has at least one premier distributor that is responsible for distributing Lifeline service throughout the state. These premier distributors put together teams of agents and they go to many different areas in the state and cover a variety of events. Air Voice may also promote the availability of its Lifeline offering by distributing brochures at various state and local social service agencies, and may partner with nonprofit assistance organizations in order to inform customers of the availability of its Lifeline service.

Accordingly, more low-income South Carolina residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of

²⁴ 47 C.F.R. §§ 54.405(b).

those opportunities by subscribing to Air Voice's service. A sample of Air Voice's planned advertising is attached hereto as **Exhibit "H."** 26 S.C. Code Regs. 103-690(C)(a)(7) requires an acknowledgement that the company will advertise in a media of general distribution the availability of its Lifeline services and the applicable charges. Air Voice makes this acknowledgement in the Affidavit of Air Voice's CEO Jim Bahri attached as **Exhibit "I."**

The FCC adopted specific requirements for Lifeline advertising in its *Lifeline Reform Order* with which the Company will also comply.²⁵ Within the deadline provided in the *Lifeline Reform Order*, the Company will include the following information regarding its Lifeline service on all marketing materials describing the service: it is a Lifeline service,

- 1) Lifeline is a government assistance program,
- 2) the service is non-transferable,
- 3) only eligible consumers may enroll in the program,
- 4) the program is limited to one discount per household;
- 5) documentation necessary for enrollment;
- 6) Air Voice's name (the ETC); and
- 7) notice that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.²⁶

These statements will be included in all print, audio, video and web materials (including social networking media) used to describe or enroll customers in the Company's Lifeline service offering, as well as the Company's application forms and certification forms.²⁷ This specifically includes the Company's website and outdoor signage.²⁸

²⁵ Lifeline Reform Order at ¶¶ 275-82.

²⁶ Lifeline Reform Order at ¶ 275.

²⁷ Id.

²⁸ Id.

C. Ability to Remain Functional in Emergency Situation. 26 S.C. Code Regs. 103-690(C)(a)(2) and 47 C.F.R. § 54.202(a)(2),

Air Voice has the ability to remain functional in emergency situations. Since Air Voice is providing service to its customers through the use of facilities obtained from other carriers it is able to provide to its customers the same ability to remain functional in emergency situations as currently provided by the carriers to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, re-routing of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

Air Voice, through its underlying carrier, AT&T, has back-up systems to ensure full functionality in the event of a loss of power or network functionality. And, Air Voice's switching facilities are housed in a carrier-class data center with fully redundant power and HVAC, a controlled temperature and humidity environment, fire-threat detection and suppression, year-round critical monitoring and secure access with biometric security. The facility features redundant generators and redundant fiber optic connectivity. The data center is a reinforced concrete building located in a secure area and collocated with the area electrical utility headquarters. It is powered from separate paths independent of any one electrical generation plant. All systems within the facility are implemented on redundant servers, each with redundant data network and power.

D. Consumer Protection and Commitment to Provide Quality Service; 26 S.C. Code Regs. 103-690(C)(a)(3) and 47 C.F.R. 54.202(a)(1) & (2).

An ETC applicant must demonstrate that it will satisfy all consumer protection and service quality standards pursuant to 26 S.C. Code Reg. 103-690(C)(a)(3). The Commission and the FCC have determined that a commitment by wireless applicants to comply with Consumer Code for

Wireless Service – adopted by the Cellular Telecommunications and Internet Association’s (“CTIA”) satisfies this requirement.²⁹ Per the requirements of 47 C.F.R. § 202(a)(1)(i), Air Voice certifies that it will comply with the service requirements applicable to the low-income support it receives as a result of designation as an ETC for the purposes of receiving Lifeline.

Air Voice will satisfy all consumer privacy protection standards as provided in 47 C.F.R. § 64, Subpart U as applicable and will protect Customer Proprietary Network Information (“CPNI”) as required by state and federal law and will certify compliance with the same on an annual basis.³⁰

On an annual basis Air Voice will certify its compliance with the CTIA Consumer Code and report the number of consumer complaints or trouble reports per 1,000 handsets or access lines consistent with the FCC’s *USF Order*³¹ and 26 S.C. Code Reg. 103-690(B)(a) and (b)(4). Air Voice in general commits to satisfying all applicable state and federal requirements related to consumer protection and service quality standards.

E. Comparable Local Usage / Rate Plan. 26 S.C. Code Regs. 103-690(C)(a)(4)

As described previously, Air Voice offers a local usage plan comparable to that offered by the ILEC in the Service Area for which it seeks designation as required by 26 S.C. Code Regs. 103-690(C)(a)(4). Air Voice’s offering will be comparable to the ILEC plans and will exceed them in several aspects. Air Voice will offer Lifeline customers a certain amount of service free of charge. In contrast to the ILEC plans, which contain relatively small local calling areas, Air Voice customers can use these free minutes to place calls statewide (and even nationwide) because

²⁹ 47 C.F.R. § 54.202(a)(3). See certification attached as Exhibit H.

³⁰ See Exhibit H.

³¹ Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776 at ¶ 4 (1997) (“USF Order”).

Air Voice does not constrict customers use by imposing a local calling requirement. Air Voice will provide Lifeline customers with E911 capabilities at no cost as well as voicemail, caller ID, and call waiting features at no cost. The very nature of the wireless phone, i.e. mobility, has a tremendous benefit to many consumers, a benefit to which a monetary value cannot be easily assigned.

F. Equal Access. 26 S.C. Code Regs. 103-690(C)(a)(5) and 47 C.F.R. § 54.202(a)(5)

Air Voice will provide equal access to long distance carriers, to the extent to which it is able to do so.³² South Carolina requires an acknowledgement from a prospective ETC that it may be required to “provide equal access to long distance carriers in the event no other eligible telecommunications carrier is providing equal access within the designated service area.” 26 S.C. Code Regs. 103-690(C)(a)(5) and 47 C.F.R. § 54.202(a)(5). See Affidavit of Jim Bahri attached as **Exhibit “I.”**

G. Universal Service Support. 26 S.C. Code Regs. 103-690(C)(a)(6)

As described earlier, Section 214(e)(1)(A) of the Act requires an ETC to offer the services supported by federal universal service support mechanisms throughout its designated service area “either using its own facilities or a combination of its own facilities and resale of another carrier’s services.”³³ As described earlier, Air Voice will provide wireless service through resale and is pursuing Blanket Forbearance from the FCC.

H. Financial and Technical Showing. 47 C.F.R. § 54.201(h)

³² The FCC’s rules no longer require an applicant to acknowledge that the FCC may require it to provide equal access to long distance carriers. See *Lifeline and Linkup Reform Order*, p. 208, revised § 54.202(a).

³³ 47 U.S.C. § 214(e)(1)(A).

Air Voice has the financial and technical capability to provide Lifeline service. As part of the *Lifeline Reform Order*, the FCC amended its rules to require a carrier seeking designation as a Lifeline-only ETC to demonstrate that it is financially and technically capable of providing the supported Lifeline service in compliance with all of the low-income program rules.³⁴ Air Voice satisfies these criteria.

Air Voice generates substantial revenues from non-Lifeline services and has access to capital from its investors. Air Voice currently provides prepaid wireless services to more than 70,000 customers. Consequently, the Company has not relied, and will not be relying exclusively on Lifeline reimbursement for its operating revenues. The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state.

VI DESIGNATION OF AIR VOICE AS AN ETC IN THE STATE OF SOUTH CAROLINA SERVES THE PUBLIC INTEREST CONSISTENT WITH THE FCC'S REQUIREMENTS AND 26 S.C. CODE REGS. § 103-690(C)(b)

The FCC has previously held that designating a competitor as an ETC in areas served by non-rural ILECs is *per se* in the public interest.³⁵ The Commission must determine that Air Voice's designation is in the public interest by considering (1) the benefits of increased consumer choice and (2) the unique advantages and disadvantages of Air Voice's service offering pursuant to 26 S.C. Code Regs. § 103-690(C)(b). These are the same factors used by the FCC.³⁶ Air Voice submits that the public interest benefits of designating Air Voice as an ETC include (1) a larger local calling area and expanded coverage area via multiple underlying carriers (as compared to

³⁴ In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb 6 2012) ("Lifeline Reform Order").

³⁵ See *Cellco Partnership*, 16 FCC Rcd, at 45.

³⁶ 47 U.S.C. § 54.202(c).

traditional wireline carriers and single wireless carriers); (2) the convenience, portability, and security afforded by mobile telephone service; (3) the opportunity for customers to control cost by receiving a pre-set amount of flat-rate monthly airtime; (4) the ability to purchase additional low-cost usage at \$.10 per minute in the event that included usage has been exhausted; (5) the ability of users to use the supported service to send and receive “SMS” or text messages as well as the option to send data and access the public internet; and (6) 911 and, where available, enhanced 911 service in accordance with current FCC requirements. In addition, the inclusion of domestic telephone toll calling as a part of Air Voice’s flat-rate wireless offering allows consumers to avoid the risks of becoming burdened with significant and unexpected per-minute charges for domestic telephone toll and overage charges. These per-minute overruns form the basis of a substantial number of consumer complaints to state and federal regulators. Accordingly, Air Voice’s offerings will help to reduce this burden on public utility regulatory boards by obviating the cause for such complaints.³⁷

A. The Benefits of Increased Competitive Choice

The FCC has long acknowledged the benefits to consumers of being able to choose from a variety of telecommunications providers and the resulting variety of telecommunications services they provide.³⁸ This is of particular interest in cases where wireless providers like Air Voice seek to provide service as an alternative to the ILEC. In the *Highland Cellular* case, the FCC recognized and affirmed that some households may not have access to the public switched network as provided

³⁷ A creamskimming analysis was not performed because the company is only seeking ETC designation for the limited purpose of offering Lifeline service. In its Virgin Mobile Forbearance Order the FCC did not perform a creamskimming analysis because Virgin Mobile was seeking ETC designation for Lifeline only, and the FCC recognized such analysis was unnecessary in Lifeline cases. See Virgin Mobile USA, L.P., Order, (2009) (“Virgin Mobile Forbearance Order”) at ~ 39 and note 101.

³⁸ See e.g. Specialized Common Carrier Services, 29 FCC2d 870 (1971).

by the ILEC.³⁹ The availability of a wireless competitor benefits all consumers. The availability of a wireless competitor benefits consumers who routinely drive long distances to attend work or school or to accomplish everyday tasks such as shopping or attending community and social events. The wireless service offered by Air Voice will provide these consumers with a convenient and affordable alternative to traditional telecommunications service that can be used while at home and away from home.

Added together, Air Voice expects these additional competitive advantages to create an atmosphere that will cause many qualified consumers, at their option, to select Air Voice's low-income wireless Lifeline service in lieu of the more traditional wireline or wireless services.

Designation of Air Voice as an ETC also creates competitive pressure for other wireline and wireless providers within the proposed service areas. In order to remain competitive in low-income markets, therefore, all carriers will have greater incentives to improve networks, increase service offerings and lower prices. This results in improved consumer services and, consistent with federal law, benefits consumers by allowing Air Voice to offer the services designated for support at rates that are "just, reasonable, and affordable."⁴⁰

B. Unique Advantages of Air Voice's Service Offerings

Air Voice will offer easy-to-use, competitive and highly affordable wireless telecommunications service, which it will make available to qualified consumers who either have no other service alternatives or who choose a wireless prepaid solution in lieu of more traditional services. Detailed information on Air Voice's service offerings was provided in a previous section.

³⁹ Federal-State Joint Bd. on Universal Serv., Highland Cellular, Inc., *Memorandum Opinion and Order*, 19 F.C.C.R. 6422 (2004).

⁴⁰ 47 U.S.C. § 254(b)(1).

Air Voice's standard customer terms and conditions in connection with its wireless service offering can be found at <http://feelsafewireless.com/terms-of-service-2/>.

Air Voice's Lifeline service is available with no credit check, deposit requirement, minimum service periods, or early termination fees. These services will be an attractive and affordable alternative to all consumers, without regard to age, residency, or credit worthiness.

Designation of Air Voice as an ETC benefits the public interest of low-income consumers throughout Air Voice's Service Area. Approval of Air Voice's ETC Application will serve the public interest by increasing participation of qualified consumers in the Lifeline program in the State of South Carolina.

C. Impact on the Universal Service Fund

Designation of Air Voice as an ETC will not pose any adverse effect in the growth in the high-cost portions of the USF, nor will it create or contribute to an erosion of high-cost funding from any rural or non-rural telephone company. The FCC reaffirmed this position when it stated that "the potential growth of the fund associated with high-cost support distributed to competitive ETCs" is not relevant to carriers seeking support associated with the low-income program.⁴¹

The FCC also recognized that the total effect of additional low-income-only ETC designations would have a minimal impact on the fund when it stated that "any increase in the size of the fund would be minimal and would be outweighed by the benefit of increasing eligible participation in the Lifeline program, furthering the statutory goal of providing access to low-income consumers."⁴² It is also vital to recognize that in the case of Lifeline support, an ETC

⁴¹ Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order, 20 FCC Rcd 15095 (2005) ("TracFone Forbearance Order") at ¶ 17.

⁴² TracFone Forbearance Order, at ¶ 17.

receives USF support *only* for the customers it obtains. In the scenario where a competitive ETC obtains a Lifeline customer from another ETC, only the “capturing” ETC provides Lifeline discounts and as a result, only the “capturing” ETC receives support reimbursement.

Designation of Air Voice as an ETC benefits the public interest of low-income consumers throughout Air Voice’s Service Area. Approval of Air Voice’s ETC Application will serve the public interest by increasing participation of qualified consumers in the Lifeline program in the State of South Carolina. It will also increase the number of carriers eligible for federal USF support, thereby proportionately increasing the amount of federal USF dollars available to South Carolina consumers. Granting ETC status to Air Voice will contribute to more South Carolina residents receiving Lifeline, thereby increasing the amount of federal USF dollars flowing into and thereby benefiting South Carolina residents. In short, South Carolina residents will get more of their money back.

VII. ANNUAL REPORTING REQUIREMENTS

Consistent with the requirements of 47 C.F.R. § 54.422 (effective April 2, 2012) and with 26 S.C. Code Regs. 103-690.1 Air Voice will comply with the federal and state annual reporting requirements.

Pursuant to 26 S.C. Code Regs. 103-690(C)(a)(5) through (7), Applicant attaches **Exhibit “I,”** an Affidavit and Certification signed Jim Bahri.

VIII. STATE UNIVERSAL SERVICE FUND AND ANNUAL ASSESSMENT.

If the designations sought herein are granted, Air Voice will be supporting Universal Service in South Carolina based on its total South Carolina retail end user revenues, and will pay the annual assessment required by S.C. Code Ann. § 58-3-100.

IX. CONCLUSION

WHEREFORE, premises considered, having demonstrated herein that Air Voice satisfies all the conditions of eligibility necessary for designation as an ETC in South Carolina, and having shown that the public and universal service interests of the telecommunications consumers of the State of South Carolina will be properly served, Air Voice respectfully requests that the Commission promptly grant this Application and designate Air Voice LLC d/b/a Air Voice as a wireless eligible telecommunications carrier.

Dated this 15 day of August, 2014

Respectfully Submitted,

AIR VOICE WIRELESS, LLC

Charles L.A. Terreni /s/

By:

Charles L.A. Terreni
Terreni Law Firm, LLC
1508 Lady Street
Columbia, South Carolina 29201
Telephone (803) 771-7228
Facsimile (803) 771-8228
Email: charles.terreni@terrenilaw.com

EXHIBIT “A”
ARTICLES OF INCORPORATION

The State of South Carolina



Office of Secretary of State Mark Hammond

Certificate of Authorization

I, Mark Hammond, Secretary of State of South Carolina Hereby certify that:

AIR VOICE WIRELESS, LLC, A Limited Liability Company duly organized under the laws of the State of MICHIGAN, and issued a certificate of authority to transact business in South Carolina on July 3rd, 2014, with a duration that is at will, has as of this date filed all reports due this office, paid all fees, taxes and penalties owed to the Secretary of State, that the Secretary of State has not mailed notice to the company that it is subject to being dissolved by administrative action pursuant to section 33-44-809 of the South Carolina Code, and that the company has not filed a certificate of cancellation as of the date hereof.

Given under my Hand and the Great
Seal of the State of South Carolina this
3rd day of July, 2014.


Mark Hammond, Secretary of State

**MICHIGAN DEPARTMENT OF CONSUMER AND INDUSTRY SERVICES
CORPORATION, SECURITIES AND LAND DEVELOPMENT BUREAU**

Date Received

MAY 06 1999

**ADJUSTED PURSUANT TO
TELEPHONE AUTHORIZATION**

with amic

(FOR BUREAU USE ONLY)

FILED**MAY 07 1999**

Administrator
CORP. SECURITIES & LAND DEV. BUREAU

517-663-2525 Ref **A2868**
Attn: Cheryl J. Bixby
MICHIGAN RUNNER SERVICE
P.O. Box 266
Eaton Rapids, MI 48827

EFFECTIVE DATE

Document will be returned to the name and address you enter above.

ARTICLES OF ORGANIZATION**For use by Domestic Limited Liability Companies**

(Please read information and instructions on last page)

B-50-804

Pursuant to the provisions of Act 23, Public Acts of 1993, the undersigned execute the following Articles:

ARTICLE IThe name of the limited liability company is: **GREAT LAKES MANAGEMENT GROUP, LLC****ARTICLE II**

The purpose or purposes for which the limited liability company is formed is to engage in any activity within the purposes for which a limited liability company may be formed under the Limited Liability Company Act of Michigan.

ARTICLE III

The duration of the limited liability company if other than perpetual is: _____

ARTICLE IV

1. The street address of the location of the registered office is:

7409 Rafford Lane

(Street Address)

West Bloomfield

(City)

Michigan48322

(ZIP Code)

2. The mailing address of the registered office if different than above:

(Street Address or P.O. Box)

(City)

Michigan

(ZIP Code)

3. The name of the resident agent at the registered office is: Falah Bahri**ARTICLE V** (Insert any desired additional provision authorized by the Act; attach additional pages if needed.)

The LLC shall be managed by its Managers.

Signed this 4 day of March, 19 99

By _____

(Signature)

Falah Bahri, Manager & Member
(Type or Print Name)

mk
609.50 CREDIT 81196

EXHIBIT “B”
OFFICERS

JIM BAHRI

♦ 2425 Franklin Rd ♦ Bloomfield Hills, MI 48302 ♦

PROFESSIONAL EXPERIENCE

AIRVOICE WIRELESS HEADQUARTERS, CORPORATE OFFICE

BLOOMFIELD HILLS, MI

FOUNDING MEMBER; CO-OWNER; CEO

APR 1999- PRESENT

- Worked in the Retail sector for over 40 years
- Co-founded company in 1999 after working in wireless industry for nearly a decade
- Developed strong knowledge and business sense on how to remain competitive within the evolving wireless industry
- Developed each rate plan ever enacted by the company by working directly with Main Carrier AT&T to create, negotiate, and maintain competitive plans
- Maintain strong professional relationships with AT&T Account executives
- Created strong network of over 10,000 agents and distributors nationwide
- Seeks input from agents on how to remain competitive in the wireless market
- Performs market research to decide which wireless devices to distribute to our agents
- Constantly researching industry regulations and standards to ensure Airvoice Wireless's complies with rules and regulations
- Attends industry trade shows and conventions to stay up-to-date on wireless trends
- Creates initiatives to provide better performance in all aspects of company performance
- Oversees marketing and advertising campaigns to maintain company presence and brand recognition
- Creates partnerships with companies to help market and distribute our products
- Meets daily with President, Vice President and Director of Operations to assess the direction and position of current company projects such as rate plan changes, web-site development, and advertising campaigns

KENNY HANNAWA

♦ 2425 Franklin Rd ♦ Bloomfield Hills, MI 48302 ♦

PROFESSIONAL EXPERIENCE

AIRVOICE WIRELESS HEADQUARTERS, CORPORATE OFFICE

BLOOMFIELD HILLS, MI

FOUNDING MEMBER; CO-OWNER; PRESIDENT

APR 1999- PRESENT

- Worked in the Retail sector for over 40 years
- Co-founded company in 1999 after working in wireless industry for nearly a decade
- Developed strong knowledge and business sense on how to remain competitive within the evolving wireless industry
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- Performs market research to decide which wireless devices to distribute to our agents
- Constantly researching industry regulations and standards to ensure Airvoice Wireless's complies with rules and regulations
- Attends industry trade shows and conventions to stay up-to-date on wireless trends
- Creates initiatives to provide better performance in all aspects of company performance
- Oversees marketing and advertising campaigns to maintain company presence and brand recognition
- Creates partnerships with companies to help market and distribute our products
- Meets daily with CEO, Vice President and Director of Operations to assess the direction and position of current company projects such as rate plan changes, web-site development, and advertising campaigns

WALLY DICKOW

♦ 2425 Franklin Rd ♦ Bloomfield Hills, MI 48302 ♦

PROFESSIONAL EXPERIENCE

AIRVOICE WIRELESS HEADQUARTERS, CORPORATE OFFICE

BLOOMFIELD HILLS, MI

FOUNDING MEMBER; CO-OWNER; VICE PRESIDENT

APR 1999- PRESENT

- Co-founded company in 1999 after working in wireless industry for nearly a decade
- Developed strong knowledge and business sense on how to remain competitive within the evolving wireless industry
- Developed each rate plan ever enacted by the company by working directly with Main Carrier AT&T to create, negotiate, and maintain competitive plans
- Maintain strong professional relationships with AT&T Account executives
- Communicates daily with AT&T account executives, IT services, and agents/distributors to stay up-to-date on all company relations as well as any network outages that may affect our customers
- Created strong network of over 10,000 agents and distributors nationwide
- Seeks input from agents on how to shape our plans to fit our customers' needs.
- Performs market research to decide which wireless devices to distribute to our agents and sell to our customers.
- Constantly researching industry regulations and standards to ensure Airvoice Wireless's compliance
- Attends industry trade shows and conventions to stay up-to-date on wireless trends
- Creates initiatives to provide better performance in all aspects of company performance
- Communicates with IT director to create new and update existing software to fit company and customer needs
- Tests all operations on developing rate plans before going live to ensure that the services work on all levels
- Maintains all day-to-day operations of the company
- Oversees marketing and advertising campaigns to maintain company presence and brand recognition
- Creates partnerships with companies to help market and distribute our products
- Meets daily with CEO, President and Director of Operations to assess the direction and position of current company projects such as rate plan changes, web-site development, and advertising campaigns

MELISSA KALLABAT

♦ 2425 Franklin Rd ♦ Bloomfield Hills, MI 48302 ♦

EDUCATION

UNIVERSITY OF MICHIGAN- DEARBORN, MI

May 2002: Bachelor of Arts; Psychology

PROFESSIONAL EXPERIENCE

AIRVOICE WIRELESS HEADQUARTERS, CORPORATE OFFICE

BLOOMFIELD HILLS, MI

AUG 2003- PRESENT

DIRECTOR OF OPERATIONS

MAY 2011- PRESENT

- Assists with executive-level decisions for company
 - Provides ideas and input to CEO, President, and Vice President on how to improve company performance
 - Attends meeting with main carrier AT&T to negotiate better offers
 - Works on all aspects advertising---creating plans, working with marketing and design companies for print and live advertisements
 - Works with web designer to ensure website is efficient, accurate, up-to-date, and easy to navigate
-

GSM OPERATIONS MANAGER

JAN 2005- PRESENT

- Work Directly with CEO, President, and Vice President to Maintain Daily Operations by Acting as a Liaison between Customer Service Staff and Company Executives
 - Handle Day to Day Operations of Customer Service Call Center that consists of over forty employees
 - Created and continue to enforce Company Rules & Policies to keep morale high in the workplace
 - Excellent at resolving service related phone issues for customer's accounts.
 - Maintain call center to ensure call wait under 2 minutes and one-call resolution for our customers
 - Constantly forging and maintaining professional relationships with customers and coworkers
 - Schedule, Organize and Conduct Monthly Meetings to enhanced team productivity.
 - Monitor and respond to all incoming emails that are generated on our website (comments/questions)
 - Interview, Hire, Train and Monitor All New Call Center Employees.
 - Maintain Correspondence between Company and its Customers and Agents
 - Draft Language Used on Company Website and on All Company Literature, Including Terms of Service
 - Communicate Directly with Company Associates Nationwide to Assist Such Agents with Their Needs
-

CUSTOMER SERVICE REPRESENTATIVE

AUG 2003- JAN 2005

- Explained service plans that we offered and was effective able to resolve customer issues
 - Assisted Management with Training New Employees
 - Consistently Chosen by Management to Assist with Special Projects
-

EXHIBIT “C”

LIST OF WIRE CENTERS

| WIRE CENTER | LOCALITY |
|-------------|----------------------|
| ABVLSCXA | ABBEVILLE |
| AIKNSCMA | AIKEN2 |
| ARSNSCAH | ANDERSON |
| ARSNSCMA | ANDERSON |
| ARSNSCTV | ANDERSON |
| AWDWSCXA | AWENDAW |
| AYNRSCXA | AYNOR |
| BATHSCMA | BATH |
| BAVLSCMA | BLACKVILLE |
| BETNSCMA | BELTON |
| BFTNSCAQ | BLUFFTON |
| BFTNSCXA | BLUFFTON |
| BHISSCMA | BEECH ISLAND1 |
| BHVLSCXA | BRANCHVILLE |
| BLBGSCMA | BLACKSBURG |
| BLNHSCMA | BLLENHEIM |
| BLRGSCMA | BLUE RIDGE |
| BONNSCXA | BONNEAU |
| BRWLSCBE | BARNWELL |
| BSVLSCAV | BISHOPVILLE RURAL |
| BSVLSCXA | BISHOPVILLE |
| BTBGSCMA | BATESBURG |
| BUFTSCXA | LOW COUNTRY |
| BWMNSCXA | BOWMAN |
| CENTSCWS | CENTRAL |
| CHAPSCCL | CHAPIN-LITTLE MTN SO |
| CHESSCXA | CHESTER |
| CHFDSCXA | CHESTERFIELD |
| CHPLSCXA | CHAPPELLE |
| CHRWSCES | CHERAW |
| CHSNSCXA | CHESNEE |
| CHTNSCDP | CHARLESTON1 |
| CHTNSCDT | ISLE OF PALMS |
| CHTNSCJM | CHARLESTON1 |
| CHTNSCJN | CHARLESTON1 |
| CHTNSCLB | CHARLESTON1 |
| CHTNSCNO | CHARLESTON1 |
| CHTNSCWA | CHARLESTON1 |
| CLCKSCXA | GEORGETOWN |
| CLHLSCXA | CLARKS HILL |
| CLIOSCMA | CLIO |
| CLMASCAR | COLUMBIA1 |
| CLMASCBQ | COLUMBIA1 |
| CLMASCCH | COLUMBIA1 |
| CLMASCDF | COLUMBIA1 |
| CLMASCPA | COLUMBIA2 |
| CLMASCSA | COLUMBIA2 |
| CLMAS CSC | COLUMBIA1 |
| CLMASCSH | COLUMBIA2 |

| WIRE CENTER | LOCALITY |
|-------------|----------------|
| CLMASCSN | COLUMBIA2 |
| CLMASCSU | COLUMBIA1 |
| CLMASCSW | COLUMBIA1 |
| CLNSNCMA | CLEMSON |
| CLTNSCMA | CLINTON |
| CLVRSCES | CLOVER |
| CMDNSCLG | CAMDEN |
| CMDNSCMA | CAMDEN |
| CMPBSCXA | CAMPOBELLO |
| CMRNSCXA | CAMERON |
| CNWYSCXA | CONWAY |
| CNWYSCXB | SOUTH CONWAY |
| CNWYSCXC | MURRELLS INLET |
| CNWYSCXM | NORTH CONWAY |
| CRHLSCXA | CROSS HILL |
| CRSSSCXA | CROSS |
| CTVLSCXA | COTTAGEVILLE |
| CWPNSCMA | COWPENS |
| DLLNSCMA | DILLON |
| DRTNSCMA | DARLINGTON |
| DWSTSCXA | DUE WEST |
| EDBHSCMA | EDISTO ISLAND |
| EDFDSCMA | EDGEFIELD |
| ELLRSCXA | ELLOREE |
| ENORSCXA | ENOREE |
| EOVRSCMA | EASTOVER |
| ESLYSCMA | EASLEY |
| ETVLSCXA | EUTAWVILLE |
| FLBHSCMA | FOLLY BEACH |
| FLRNSCMA | MYRTLE BEACH |
| FLYDSCXA | FLOYDS |
| FNINSCES | FOUNTAIN INN |
| FNVLSCMA | SPARTANBURG |
| FTLWSCXA | FORT LAWN |
| FTMLSCXB | FORT MILL |
| GFNYSCMA | GAFFNEY |
| GIVLSCMA | GRANITEVILLE |
| GLBRSCXA | GILBERT |
| GNVLSCBE | GREENVILLE |
| GNVLSCCH | GREENVILLE |
| GNVLSCCR | GREENVILLE |
| GNVLSCDT | SPARTANBURG |
| GNVLSCWE | GREENVILLE |
| GNVLSCWP | GREENVILLE |
| GNVLSCWR | GREENVILLE |
| GNWDSCXB | GREENWOOD |
| GNWDSCXC | GREENWOOD |
| GRCRSCXA | GRAY COURT |
| GRERSCMA | GREER |

| WIRE CENTER | LOCALITY |
|-------------|------------------|
| GRFLSCXA | GREAT FALLS |
| GRTWSCXA | GEORGETOWN |
| GRVRNCMA | ANTIOCH |
| GSTANCSO | MILL CREEK |
| HCGVSCMA | HICKORY GROVE |
| HCTVSCXA | HICKOYTVRN |
| HDGSSCXA | HODGES |
| HLHDSCXA | HILTON HEAD |
| HLHDSCXB | HILTON HEAD |
| HLHDSCXC | HILTON HEAD |
| HLHLSCXA | HOLLY HILL |
| HLVLSCXA | HARLEYVL |
| HLWDSCXA | HOLLYWOOD |
| HMNGSCXA | HEMINGWAY |
| HMPNSCXA | HAMPTON |
| HNPWSCMA | HONEA PATH |
| HNVLSCXA | HENDERSNVL |
| HRVLSCXA | HARDEEVILLE |
| HTVLSCMA | HARTSVILLE |
| HUGRSCXA | HUGER |
| INMNSCXA | INMAN |
| ISPLSCIS | SULLIVANS ISLAND |
| IVA SCXA | IVA |
| JCSNSCXA | JACKSON |
| JHTNSCMA | JOHNSTON |
| JMTWSCXA | JAMESTOWN |
| JNVLSCMA | JONESVILLE |
| JONNSCES | JOANNA |
| KRSHSCXB | KERSHAW |
| LAMRSCXA | LAMAR |
| LATTSCLS | LATTA |
| LBNNSCXA | LEBANON |
| LBRTSCMA | LIBERTY |
| LKWDSCXA | LAKEWOOD |
| LKWLSCRS | LAKE WYLIE,SC |
| LNCSSCXA | LANCASTER |
| LNDRSCXA | LANDRUM |
| LODGSCXA | LODGE |
| LORISCXA | LORIS |
| LRBYSCXA | LAUREL BAY |
| LRNSSCXB | LAURENS RURAL |
| LRNSSCXC | LAURENS |
| LWCNSCAA | LOW COUNTRY |
| LWVLSCXA | LEWISVILLE |
| LXTNSCXC | LEXINGTON |
| LYBGSCXA | LYNCHBURG |
| LYMNSCES | LYMAN |
| LYMNSCIP | LYMAN |
| MARNSCBN | MARION |

| WIRE CENTER | LOCALITY |
|-------------|--------------------|
| MARNSCMA | MARION |
| MCBESCXA | MC BEE |
| MCCRSCXB | MCCORMICK |
| MCDNSCXA | MACEDONIA |
| MLNSSCWP | NICHOLS |
| MLVLSCXA | MCCLELLANVILLE |
| MNCRSCXB | CHARLESTON1 |
| MNNGSCXA | MANNING |
| MNPLSCES | MT PLEASANT |
| MRINSCXA | DARLINGTON |
| MRTTSCMA | TRAVELERS REST |
| MTCRSCXA | MT CARMEL |
| MTVLSCXA | MOUNTVILLE |
| MYBHSCXB | MYRTLE BEACH |
| MYBHSCXC | MYRTLE BEACH |
| MYBHSCXM | MYRTLE BEACH |
| MYVLSCXA | MAYESVILLE |
| NAGSSCMA | BEECH ISLAND2 |
| NMNGSCXA | NORTH MANNING |
| NRTHSCXB | NORTH |
| NRWYSCXA | NORWAY |
| NSMTSCXB | NORTH SUMTER |
| NSTNSCXA | NORTH SUMMERTON |
| NTSXSCXA | NINETY SIX |
| NWBYSMA | NEWBERRY |
| NWELSCMA | NEW ELLENTON |
| ODBHSCXB | NORTH MYRTLE BEACH |
| OKLDSCXA | OAKLAND |
| ORBGSCMA | ORANGEBURG |
| PCKNSCES | PICKENS |
| PCLTSCMA | PACOLET |
| PDMTSCES | PIEDMONT |
| PELISCXA | PELION |
| PGLDSCXA | PAGELAND |
| PIVLSCXA | PINEVILLE |
| PLBHSCXA | PLUMBRANCH |
| PNBHSCXA | PONDBRANCH |
| PNTNSCMA | PENDLETON |
| PNWDSCXA | PINEWOOD |
| POCLSCXA | POCALLA |
| PRSRSCMA | PROSPERITY |
| PWISSCXA | PAWLEYS ISLAND |
| RCHLSCXB | DAVIDSON |
| RDLDSCXA | RIDGELAND |
| RDSPSCXA | RIDGE SPRING |
| RDWYSCXA | RIDGEWAY |
| RWLDNCMA | ROWLAND |
| SALDSCXA | SALUDA |
| SALMSCMA | SALEM |

| WIRE CENTER | LOCALITY |
|-------------|--------------------|
| SANTSCXA | SANTEE |
| SBRKSCSK | CHARLESTON1 |
| SCHLSCES | SOCIETY HILL |
| SENCSCMA | SENECA |
| SHHGSCXB | SHAW AFB HEIGHTS |
| SMTNSCXA | SUMMERTON |
| SMTRSC02 | ESUMTER |
| SMTRSCXA | SUMTER |
| SPBGSCBS | SPARTANBURG |
| SPBGSCCV | SPARTANBURG |
| SPBGSCHW | SPARTANBURG |
| SPBGSCMA | SPARTANBURG |
| SPBGSCWV | SPARTANBURG |
| SSVLSCXA | SIMPSONVILLE |
| STBGSCXA | STATEBURG |
| STGRSCMA | ST GEORGE |
| STHLSCXA | ST HELENA ISLAND |
| STMTSCXA | ST MATTHEWS |
| STRRSCXA | STARR |
| SUVLSCMA | SUMMERVILLE2 |
| SWNSSCXB | SWANSEA |
| SXMLSCMA | SIX MILE |
| TBVLSCXA | TURBEVILLE |
| TKNASCST | SENECA |
| TMVLSCMA | TIMMONSVILLE |
| TROYSCXA | TROY |
| TRRSSCMA | TRAVELERS REST |
| UNINSCMA | UNION,SC |
| WAMPSCXA | WAMPEE |
| WAVLSCXA | WABBEVILLE |
| WCLMSCMA | COLUMBIA2 |
| WDRFSCXA | WOODRUFF |
| WENDSCXA | WEST END |
| WGNRSCXA | WAGENER |
| WHTMSCMA | WHITMIRE |
| WLBOSC02 | SOUTH WALTERBORO |
| WLBOSCXC | WALTERBORO |
| WLBOSCXE | NORTH WALTERBORO |
| WLHLSCES | WALHALLA |
| WLMSSCXA | WILLIAMS |
| WLSTSCXA | WILLISTON |
| WMBHSCXA | WEST MYRTLE BEACH |
| WMNSSCES | WESTMINSTER |
| WMTNSCPW | WILLIAMSTON |
| WNBOSCXA | WINNSBORO |
| WNHLSCXA | NORTH MYRTLE BEACH |
| WRSHSCXA | WARE SHOALS |
| WTRLSCXA | WATERLOO |
| YMSSSCXA | YEMASSEE |

| WIRE CENTER | LOCALITY |
|-------------|----------|
| YORKSCMA | YORK |

EXHIBIT “D”
TERMS OF SERVICE



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Terms of Service

1) Service Availability: Service is available only if you are within the Feel Safe Wireless GSM coverage area. Service may be interrupted due to system capacity limitations and system repairs or modifications. Service is subject to limitation or interruption caused by weather, terrain, obstructions such as trees or buildings and other conditions. Feel Safe Wireless is not responsible for time lost or days lost for interruption of service caused by above mentioned. There will be no credits or refunds issued for any reason.

2) Use of Device: Only Certified & Approved Unlocked 850/1900 MHz GSM phones are compatible with Feel Safe Wireless service.

3) Right to Terminate Service: We reserve the right to cancel, interrupt or restrict service to your number, without notice if we suspect fraudulent, illegal or abusive activity, abnormally high amounts of usage, failure to maintain an appropriate account balance for applicable charges, for harassing our employees and/or harassing other Airvoice customers. Some examples of fraudulent activity include Traffic Pumping and Spam Messaging. We reserve the right to cancel accounts for fraudulent activity based on voice calls, SMS, MMS and data usage.

4) Release of information: Feel Safe Wireless may release information about your account when we believe release is appropriate to comply with the law (i.e. subpoena, court order, E911 information, etc.). There will be no call histories released to customers for any reason.

5) PUK Codes: Please contact our US based customer service at 1-877-247-7799 if your phone asks for a PUK code. Do not attempt guessing any codes because it will disable your SIM card

6) Phone Codes: If your phone is asking for ANY codes you are not aware of, do not attempt guessing any codes because it may disable your SIM card. You will need a new Non-Active Feel Safe Wireless SIM card if you disable your SIM card.

7) Account Information: Any person that is able to verify your mobile number, SIM card number and/or account information is authorized by you to make changes to your account.

8) Ability to change services: You will have the ability to change from one Feel Safe Wireless rate plan to another upon request if proper verification is provided. Please contact our US based customer service at 1-877-247-7799.

9) Cancellation Policy: Cancellation requests should be put in writing, faxed to (248) 239-0182. You will lose any remaining airtime on your

account. Feel Safe Wireless will not provide a refund or credit for any remaining airtime lost.

10) Porting Policy: You are able to port your number out of Feel Safe Wireless to other carriers. Feel Safe Wireless does not guarantee that number transfers to or from our company will be successful. If you request to port your number out to another company, that is considered a request by you to us to terminate all of the services associated with that number. Your remaining airtime will be forfeited and you will not receive a credit for the remaining balance. Feel Safe Wireless will not release your wireless number to another carrier without proper verification. If you are attempting to change service providers, you will need to verify your four-digit pin as well as your Feel Safe Wireless SIM card number, which is your account number, in order to transfer your account. Your account must be in an active status in order to port out.

11) Charges: You will be billed regular airtime charges for calls made to 800, 866, 877, 888 and all other toll free calls. Domestic long distance calls will be billed at regular airtime charges. Calls to international numbers will be billed at a higher rate (call customer service for rates). For all calls, the length of the call will be measured during the time that you are connected to our system, which is approximately from the time you press "SEND" or other key to begin a call until approximately the time you press "END" key to terminate the call. Airtime usage on each call is deducted in full minute increments, with partial minutes of use rounded up to the next full minute. Unanswered calls lasting 30 seconds or more will be charged standard airtime and rounded up to the nearest minute. Features such as call waiting, 3-way calling, call forwarding and voicemail will incur applicable airtime charges.

12) Account Balance: All calls will be automatically deducted from your account balance. Balances are not transferable or refundable. Airtime cannot be moved from one phone number to another phone number. You should take reasonable efforts to safeguard your phone and Refill airtime cards. Refill Airtime expires "X" amount of days after a refill card is added to your account whether you use the airtime or not.

13) Use of Service/Rates: International rates vary and are subject to change without notice. It is always best to contact customer service for up to date rates and available countries. You cannot use our service to place calls to numbers that begin with 500, 700, 855, 900 or 976. You cannot use the service to place operator assisted calls such as third party billed, and collect calls. If you are unable to successfully place a call out, attempt dialing with 1 + the area code + the 7-digit number. It is highly recommended that you power cycle your phone at least once per day to help re-register our phone within the Network.

14) Disputes: All disputes must be submitted within 30 days. Feel Safe Wireless is not responsible for disputes that occurred more than 30 days from the date of the dispute.

15) Multimedia Messaging: Multimedia Messaging service is an optional feature available to Feel Safe Wireless customers if a Feel Safe Wireless Refill card is added. This service will only work if used with a compatible handset and proper Feel Safe Wireless MMS configuration settings. Customers without MMS capable handsets will not receive credit for inability to send/receive multimedia messages. You should verify that your phone is MMS compatible before using this feature. Any Multimedia Message you attempt to send or receive will deduct 1 Unit from your account balance, whether it is successfully delivered or not. You may attempt to download ringtones and games via Multimedia messaging. Feel Safe Wireless is not responsible if you are unable to download, or save ringtones, games, or other multimedia content to your wireless device. You will still be charged a multimedia message if you receive an MMS, but are not able to save the content to your phone. Feel Safe Wireless will not issue any credits for this reason. You will have the ability to send and receive MMS messages as a combination of text, photos, animations, video or sound on compatible handsets. Not all MMS handsets support all features of the service. MMS customers cannot send and receive messages in MMS format with other mobile customers who do not have an MMS

compatible handset and/or are not activated. If a Feel Safe Wireless MMS message is sent to a mobile handset that cannot receive the message in MMS format, the recipient will need to have an SMS compatible handset and Service to receive this message. The recipient can access the message via the website for up to 7 days before deletion. Please note, you will still be charged an MMS message even if the recipient does not have MMS. There may be a delay between when a message is sent and when it is received. Feel Safe Wireless accepts no liability for any loss or damage as a result of a delay in receiving a message, a message not being secure or non delivery of a sent message. Recipients of your sent message must be within the coverage of their participating supplier's mobile network to receive a Multimedia message. If a recipient's phone is turned off, or out of their coverage area, the multimedia message is still considered sent, and you will still be charged 1 Unit for the message.

16) Mobile Web/Data: Mobile Web or Data service is an optional feature available to Feel Safe Wireless customers if a Feel Safe Wireless Refill Card is added. This service will only work on compatible handsets that offer a web browser and handsets that are properly configured with Feel Safe Wireless data settings. It is your responsibility to ensure that your device is data capable. Data is measured and billed per UNIT (1 Unit = 342 KB), at \$0.000325/KB. There are 1024 KB in one MB of data (3 Units = 1 MB). Using one full MB of data will result in 3 Units of data charges. A data session consists from the time you access the internet via the mobile device until you terminate the session. Multiple sessions can be initiated within a 24 hour period; each session will be charged per 1 Unit minimum and rounded to the next Unit, and billed as separate events. You are responsible for ending each data session. If you fail to end a session, the internet will still be considered connected on your device, and your account will still be charged 1 Unit per 324 KB used until you end all sessions. Failure to log off of the internet will result in depletion of your airtime. Feel Safe Wireless will NOT issue credits for this reason.

17) Handset Warranty: All handsets have a one year warranty from the date of activation. To receive a replacement phone under the warranty, please mail the phone via any shipping method to our company headquarters with a letter explaining the issue.

Airvoice Wireless, LLC

Attention: Lifeline

2425 Franklin Road

Bloomfield Hills, MI 48302

A replacement phone will be mailed if the issue is covered by the warranty. We suggest you contact customer service at 1-877-247-7799 to ensure your handset issue is covered under the warranty before mailing the device to our office.

* All Information is subject to change at any time with or without notification. Because of frequent network upgrades, sometimes rates and other information may change. It is best to call our U.S. based customer service at 1-877-247-7799 or visit our website www.FeelSafeWireless.com for up to date information.

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EXHIBIT “E”
HANDSETS



Federal Communications Commission

Hearing Aid Compatibility Status Report (FCC Form 655)

Reporting Period: January 1, 2013 - December 31, 2013

Filing Confirmation Number: 0006100465

Filing Deadline: January 15, 2014

FRN: 0019466515

Filing Date: 01/14/2014 11:04 PM

General Report Information

Type of Company

Service Provider

De Minimis Exception

Did you offer any handsets to subscribers in the United States during the reporting period? Yes

Have you been offering handsets in the United States for at least three years prior to the end of the reporting period? Yes

Date that you began offering handsets in the United States

Are you a small entity? Yes

Were you a small entity at any time during the three years prior to the end of the reporting period?

Date that you ceased to be a small entity?

Company Information

Company Name: Airvoice Wireless

Brand Names: Airvoice Wireless
Feelsafe Wireless

PO Box:

Street Address: 2425 FRANKLIN RD

City: Bloomfield Hills

State: MI

Zip Code: 48302

Contact Name: Melissa Kallabat

Contact Phone: (248) 239-1061

Contact Fax:

Contact Email: mkallabat@airvoicewireless.com

Filing Agent

Is this report being filed by an agent on behalf of a manufacturer or service provider? Yes

Agent Name: GSA
PO Box:
Street Address: 6250 Shiloh Road
City: Alpharetta
State: GA
Zip Code: 30005

Contact Name: Patrick Hardy
Contact Phone: (678) 304-6472
Contact Fax:
Contact Email: patrick@gsaudits.com

Product Labeling

Do all hearing aid-compatible handsets include labeling? Yes

Explain:

Do all hearing aid-compatible handsets that are capable of voice communication over any air interface or frequency band that does not have hearing aid compatibility technical standards under ANSI C63.19-2007 include the required language disclosing that the handset has not been rated for hearing aid compatibility with respect to such operations? N/A

Explain:

Do all hearing aid-compatible handsets that the manufacturer also tested and found not to meet hearing aid compatibility requirements under ANSI C63.19-2011 for one or more operations that are not covered under ANSI C63.19-2007, include language informing users by clear and effective means that the handset does not meet the relevant rating or ratings with respect to such operation(s)? N/A

Explain:

Do all handsets that are capable of use for Voice over LTE, and that were certified for inductive coupling capability under ANSI C63.19-2011 without being tested for inductive coupling capability over VoLTE, include language disclosing that they were not tested with respect to this operation? N/A

Explain:

Do all handsets that meet the criteria for an M3 rating by allowing the user to reduce the maximum power for GSM operation in the 1900 MHz band include the required disclosure? Yes

Explain:

Public Website

Does your company maintain a public website describing all hearing aid-compatible models, the ratings of those models, and an explanation of the rating system? Yes

Website address: www.airvoicewireless.com

Explain:

Consumer Outreach

Describe consumer outreach efforts in the past 12 months: Airvoice Wireless provides various tools to inform consumers about its product offerings that are hearing aid compatible through its website and through face to face outreach in the communities it services.

Methodology for Functionality Levels

Good - Handset features provide basic talk and text functions.

Better - Handset features include voice, messaging/text, and advanced features such as data including email and web.

Best - Handset features include voice, text, data and web features. Additional features such as touch screens and the ability to operate on multiple bands. Handsets in this category would be considered smartphones.

Report Remarks

You have reported the following handset model summary information.

Total number of handsets offered: 28

| Air Interface | Fully Hearing Aid Compatible | | Acoustic Coupling Compatible Only | | Non-Compliant Handsets | | Excluded Handsets Number | Total by Air Interface |
|---------------|------------------------------|---------|-----------------------------------|---------|------------------------|---------|--------------------------|------------------------|
| | Number | Percent | Number | Percent | Number | Percent | | |
| GSM | 21 | 75% | 7 | 25% | | | | 28 |
| CDMA | 1 | 100% | | | | | | 1 |
| WCDMA | 2 | 100% | | | | | | 2 |

Handset 1: Alcatel 808a

Handset Maker

Alcatel

Handset Model Name

808a

FCC ID

RAD119

Air Interfaces/Frequency Bands

850 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating:

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset Maker

Alcatel

Handset Model Name**FCC ID**

871A

RAD264

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks**Handset 3: Alcatel 888A****Handset Maker**

Alcatel

Handset Model Name**FCC ID**

888A

RAD173

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 4: Alcatel 908A

Handset Maker

Alcatel

Handset Model Name

908A

FCC ID

RAD169

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 5: Alcatel 918A

Handset Maker

Alcatel

Handset Model Name

918A

FCC ID

RAD218

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T4

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 6: Alcatel 981A

Handset Maker

Alcatel

Handset Model Name

981A

FCC ID

RAD149

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating:

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 7: Alcatel 995A

Handset Maker

Alcatel

Handset Model Name

995A

FCC ID

RAD214

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating:

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 8: Alcatel MPOP 5020W

Handset Maker

Alcatel

Handset Model Name

MPOP 5020W

FCC ID

RAD356

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T4

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 9: Alcatel OT-808A

Handset Maker

Alcatel

Handset Model Name

OT-808A

FCC ID

RAD119

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 01/13 to 12/13

Ratings

M-Rating: M3

T-Rating:

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 10: Alcatel OT-838G

Handset Maker

Alcatel

Handset Model Name

OT-838G

FCC ID

RAD265

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating:

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 11: Apple iPhone 4S

Handset Maker

Apple

Handset Model Name

iPhone 4S

FCC ID

BCG-E2430A

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Best

Remarks

Handset 12: Apple iPhone 5

Handset Maker

Apple

Handset Model Name

iPhone 5

FCC ID

BCG-E2599A

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Best

Remarks

Handset 13: Apple iPhone 5c

Handset Maker

Apple

Handset Model Name

iPhone 5c

FCC ID

BCG-E2644A

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T4

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Best

Remarks

Handset 14: EMPORIA Clickplus Senior

Handset Maker

EMPORIA

Handset Model Name

Clickplus Senior

FCC ID

ZVP-F210

Air Interfaces/Frequency Bands

800 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M4

T-Rating: T4

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 15: HTC Status

Handset Maker

HTC

Handset Model Name

Status

FCC ID

NM8PH06110

Air Interfaces/Frequency Bands

800 MHz GSM

850 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 16: LG Nitro HD

Handset Maker

LG

Handset Model Name

Nitro HD

FCC ID

BEJP930

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Better

Remarks

Handset 17: Samsung A767

Handset Maker

Samsung

Handset Model Name

A767

FCC ID

A3LSGHA767

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 01/13 to 11/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 18: Samsung a777

Handset Maker

Samsung

Handset Model Name

a777

FCC ID

A3LSGHA777

Air Interfaces/Frequency Bands

850 MHz GSM

850 MHz CDMA

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

1900 MHz CDMA

Dates

This handset model was offered from: 01/13 to 11/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 19: Samsung Captivate Glide

Handset Maker

Samsung

Handset Model Name

Captivate Glide

FCC ID

A3LSGHI927

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Better

Remarks

Handset 20: Samsung Galaxy Note II

Handset Maker

Samsung

Handset Model Name

Galaxy Note II

FCC ID

A3LSGHT889

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating:

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Best

Remarks

Handset 21: Samsung Galaxy S 4 Active

Handset Maker

Samsung

Handset Model Name

Galaxy S 4 Active

FCC ID

A3LSMC105A

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Best

Remarks

Handset 22: Samsung Galaxy S4 Mini

Handset Maker

Samsung

Handset Model Name

Galaxy S4 Mini

FCC ID

A3LSPHL520

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 01/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Best

Remarks

Handset 23: Samsung i577

Handset Maker

Samsung

Handset Model Name

i577

FCC ID

A3LSGHI577

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating:

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

better

Remarks

Handset 24: Sony Ericsson Xperia X10 Xperia E

Handset Maker

Sony Ericsson Xperia X10

Handset Model Name

Xperia E

FCC ID

PY7PM-0260

Air Interfaces/Frequency Bands

850 MHz GSM

850 MHz WCDMA

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

1900 MHz WCDMA

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Better

Remarks

Handset 25: Sony Ericsson Xperia X10 Xperia SP C5302

Handset Maker

Sony Ericsson Xperia X10

Handset Model Name

Xperia SP C5302

FCC ID

PY7PM-0360

Air Interfaces/Frequency Bands

850 MHz GSM
850 MHz WCDMA
900 MHz GSM
1800 MHz GSM
1900 MHz GSM
1900 MHz WCDMA
2100 MHz WCDMA

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Better

Remarks

Handset 26: Sony Ericsson Xperia X10 Xperia ZL C6502

Handset Maker

Sony Ericsson Xperia X10

Handset Model Name

Xperia ZL C6502

FCC ID

PY7PM-0240

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Better

Remarks

Handset 27: ZTE Z221

LIFELINE

Handset Maker

ZTE

Handset Model Name

Z221

FCC ID

Q78-Z221

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Handset 28: ZTE Z431

Handset Maker

ZTE

Handset Model Name

Z431

FCC ID

Q78-Z431

Air Interfaces/Frequency Bands

850 MHz GSM

900 MHz GSM

1800 MHz GSM

1900 MHz GSM

Dates

This handset model was offered from: 11/13 to 12/13

Ratings

M-Rating: M3

T-Rating: T3

Did this handset meet the criteria for an M3 rating for operations over GSM at 1900 MHz by enabling the user optionally to reduce the maximum power at which the handset will operate by no more than 2.5 decibels, except for emergency calls to 911? Y

Functionality Level

Good

Remarks

Certification

This Report has been certified by:

Patrick Hardy Regulatory Consultant

01/14/2014 11:04 PM

Reference Copy

EXHIBIT “F”
FINANCIAL STATEMENTS
FILED UNDER SEAL

EXHIBIT “G”
FCC COMPLIANCE PLAN

**Before the
Federal Communications Commission
Washington, D.C. 20554**

| | | |
|---|---|----------------------|
| In the Matter of the |) | |
| |) | |
| Telecommunications Carriers Eligible for |) | WC Docket No. 09-197 |
| Universal Service Support |) | |
| |) | |
| Airvoice Wireless, LLC Petition |) | WC Docket No. 11-42 |
| for Forbearance from 47 U.S.C. § 214(e)(1)(A) |) | |

AIRVOICE WIRELESS, LLC'S AMENDED COMPLIANCE PLAN

On March 2, 2012 Airvoice Wireless, LLC (“Airvoice” or “Company”) submitted its Compliance Plan to the Commission.¹ In the Compliance Plan, Airvoice detailed the measures it will take to implement the conditions imposed by the FCC in its Forbearance Order, released on February 6, 2012.² By this filing, Airvoice hereby further amends the Compliance Plan, providing additional information and/or clarifications. Airvoice respectfully requests expeditious approval of this plan so that it may, following designation as an ETC, provide critical Lifeline services to qualified low income customers.

BACKGROUND

The Commission’s *Order* granted Airvoice’s request for forbearance from the Section 214(e)(1)(A) requirement that a carrier designated as an ETC for purposes of federal universal service support provide services, at least in part, over its own facilities, stating Airvoice may,

¹ Airvoice filed an Amended Compliance Plan on May 16, 2012.

² *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, Report and Order and Further Notice of Proposed Rulemaking (February 6, 2012) (“*Order*”).

after meeting certain obligations set forth in the *Order*, seek ETC designation to offer discounted services to qualified low-income consumers through the universal service Lifeline program.³

The Commission's grant of forbearance is subject to the following conditions: (a) Airvoice providing its Lifeline customers with 911 and Enhanced 911 (E911) access regardless of activation status and availability of prepaid minutes; (b) Airvoice providing its Lifeline customers with E911-compliant handsets and replacing, at no additional charge to the customer, noncompliant handsets of existing customers who obtain Lifeline-supported service; (c) Airvoice complying with conditions (a) and (b) as of the date it provides Lifeline service; and (d) Airvoice filing and the Commission approving a compliance plan that details how Airvoice will comply with obligations in the *Order*, including procedures Airvoice will follow when enrolling Lifeline subscribers and requesting reimbursement; providing marketing and other materials that will be used for the initial and ongoing customer certifications, as described in Appendix C of the *Order*; as well as other steps to safeguard against waste, fraud and abuse in the Lifeline program; describes how and where Airvoice offers the service; and, a describes Airvoice's Lifeline service plans.

A. COMPLIANCE PLAN

Airvoice Wireless commits to comply with conditions that the Commission has set forth in the *Order*, the requirements described in this Compliance Plan, and any and all laws and regulations that govern the Lifeline-supported prepaid wireless service. Airvoice, offering its

³ *Id.*

wireless services under the brand designation of “Feel Safe Wireless”, does not have a holding company, operating company or any affiliates.⁴

Airvoice has been providing prepaid wireless services since 1999 and is one of the largest prepaid wireless providers in the United States. Since 1999, Airvoice has provided services to more than one million consumers. The Company is privately held, has been profitable since inception, has no outstanding debt and is financially capable of providing Lifeline service in accordance with the Commission’s rules. Airvoice, which maintains its headquarters and customer service center⁵ in Bloomfield Hills, Michigan, has approximately 5000 retail agents throughout the United States. Its key management has been with the company since 1999 and has significant technical and managerial experience providing prepaid wireless services to consumers.⁶ The Company operates as an MVNO and, thus, also relies on the technical expertise of its underlying carrier, AT&T. Currently, Airvoice provides services to more than 150,000 prepaid (non-Lifeline) customers in more than 20 states, with its largest markets in California, Indiana, Michigan, Pennsylvania and Texas.⁷

I. Access to 911 and E911 Services

Airvoice will provide all of its Lifeline subscribers with access to emergency calling services at the time the Lifeline service is initiated. Such 911 and E911 access will be available from Airvoice handsets regardless of the status of the subscriber account or the airtime balance associated with the handset. The Company’s current practice provides access to 911 and E911

⁴ Order at ¶ 390.

⁵ The customer service center is staffed with account and technical support representatives between the hours of 10 a.m. and 10 p.m. (EST). .

⁶ Order at ¶¶ 387-388.

⁷ Order at ¶ 379.

service to the extent that these services have been deployed by its underlying carrier, AT&T. Under current practice, access to such emergency services is still made available to subscribers whether their account is active, suspended, terminated, or has reached the minimum required airtime balance.

II. E911-Compliant Handsets

Airvoice will ensure that all handsets shipped to Lifeline service subscribers will be E911-compliant. All of the Company's mobile devices are 911 and E911-compliant. In the event that an existing subscriber has a noncompliant handset, the Company will immediately replace such device with an E911-compliant handset at no additional charge to the subscriber.

III. Certification of Lifeline Customers' Eligibility

A. Policy

Airvoice will comply with all certification and verification requirements for Lifeline eligibility by states where it is designated as an ETC. In states where there are no state imposed requirements, Airvoice will comply with the certification and verification procedures in effect in that state as reflected on the website of the Universal Service Administration Company. For any states which do not mandate Lifeline support and/or which do not have established rules of procedure in place, Airvoice will certify at the outset and will verify annually consumers' Lifeline eligibility in accordance with the Commission's requirements.

B. Certification Procedures

Airvoice will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting Airvoice in person or via telephone, facsimile, or the Internet. At this time, approximately 80% of Airvoice's new customers apply for the benefit in person. Airvoice anticipates that 95% of its Lifeline customers will apply for

the benefit in person. The Application Form, attached as Exhibit A, is the same for each form of contact.

Airvoice's application form for its wireless service will identify that it is a "Lifeline" application. The application will indicate that Lifeline service is a government benefit, nontransferable and limited to one line per household (as defined therein). The Lifeline application form will require the provision of certain customer information, including, name, date of birth, last four digits of social security number or Tribal government identification number, permanent or temporary residential address (no P.O. boxes), billing address if different from the residential, telephone number and e-mail address (if available). The application form will list each of the qualifying federal and state programs and the applicant will be required to attest, with a checkmark, any program(s) in which they participate and provide proof of program participation.⁸ Alternatively, the applicant may elect to certify under penalty of perjury that their household income does not exceed the relevant threshold (e.g., 135% of the Federal Poverty Guidelines ("FPG") for federal default states). This election will require applicants to indicate the number of individuals in their household and provide proof of income-based eligibility.⁹

In addition, the Lifeline application form will include a certification section where the applicant must certify and sign under penalty of perjury that, among other statements, 1) the

⁸ Program eligibility may be demonstrated through the provision of "(1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program." In certain states, program eligibility may be confirmed through query of available databases. *Order* at ¶ 101.

⁹ *Id.* Income eligibility may be demonstrated through the provision of "prior year's state or federal tax return, Tribal tax return, current income statement from employer, paycheck stub, Social Security or Veterans Administration statement of benefits, retirement/pension statement of benefits, Unemployment/Workmen's Compensation statement of benefits, federal or Tribal notice letter of participation in General Assistance or a divorce decree, child support award or other official documentation containing income information."

applicant's representations are true and correct, 2) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law, 3) the applicant participates in one or more of the eligible federal and state programs or has an income below the FPG, 4) their household will receive Lifeline-supported service only from Airvoice¹⁰, 5) that the applicant will be required to recertify eligibility annually and 6) the applicant understands, and consents to, that certain applicant information will be provided to the Lifeline benefit administrator. Penalties for perjury will be clearly-stated on the certification form, as required by the *Order*. Airvoice's Lifeline application will include, among others, the following certifications:

The information contained in my application is true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in my being barred from the program.

Initial
Here

I am a current recipient of the program indicated above, or have an annual income at or below 135% of the Federal Poverty Guidelines, and I have provided the documentation of eligibility.

Initial
Here

I certify that no other member of my household is receiving a Lifeline supported service from any other landline or wireless company such as Assurance, Safelink or Reachout Wireless.

Initial
Here

I understand that my Feel Safe Lifeline service is non-transferrable. I may not transfer my service to any individual, including another eligible low-income consumer.

Initial
Here

¹⁰ In situations where there are multiple households sharing an address, the applicant must complete a separate document which includes "1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income..., and (4) the penalty for a consumer's failure to make the required one-per-household certification." *Order* at ¶ 78.

I acknowledge, and consent to, that certain information including my name, date of birth, last four digits of my social security number or Tribal government identification number, temporary, permanent and billing address, telephone number and e-mail address will be provided to Lifeline administrator.

Initial
Here

Applicant's Signature: _____ Date: _____

Certification is good for up to one (1) year from the date of signing. This certification must be updated annually to avoid program termination.

Consumers will be signed up in person through retail agents or directed, via company literature, collateral or advertising, to a toll-free telephone number and to Airvoice's website. The website will contain a link to information regarding the Company's Lifeline service plans, including a detailed description of the benefit and the program and income eligibility criteria. Airvoice will have direct contact with all customers applying for Lifeline service, either in person through its employees, agents or representatives, via the Company's website, via the telephone (including facsimile) or mail. Airvoice will provide Lifeline-specific training to all personnel, whether employees, agents or representatives at authorized locations, that interacts with actual or prospective consumers with respect to obtaining, changing or terminating its Lifeline services. Airvoice understands and acknowledges its responsibility for the acts and omissions of its employees, agents and representatives.¹¹ As such, Airvoice will only enroll applicants at retail locations at which Airvoice has an agency agreement with the retailer. Airvoice will require all agent retailers to have all employees responsible for lifeline enrollment complete the standard Airvoice representative training. By establishing these agency agreements

¹¹ Order at ¶110.

with all retail outlets, Airvoice meets the “deal directly” requirement adopted in the TracFone Forbearance Order.

In retail settings, consumers will interact with one or more of Airvoice’s Lifeline trained agents or representatives (collectively the “AAR”). The AAR will provide the applicant with printed information describing Airvoice’s Lifeline program, including eligibility requirements and enrollment instructions. The AAR will also verbally explain the Lifeline benefit (a non-transferable government benefit, limited to one-per-household) and the qualification (income or program based), documentation (i.e. government issued identification, proof of program eligibility, address, three months of pay stubs, tax returns, benefit statements etc.) and certification requirements (i.e. penalty of perjury, one-per-household etc.) of the program. Once the AAR has determined that the applicant is a candidate for Lifeline service, the applicant will be asked to provide one form of government issued identification (driver’s license, identification card, or passport)¹² and to complete the Lifeline application.¹³ The AAR will review the application and all supporting documentation. The AAR will confirm if the applicant or any other individual at the stated address, as confirmed and sanitized by the Melissa Data program, is currently receiving Lifeline service from Airvoice. The applicant’s name, address, DOB and last four digits of social security number are also crosschecked against any other providers serviced

¹² A copy of the identification will be retained by Airvoice if the applicant is approved for service.

¹³ Airvoice employs two real time software programs during the application process. Specifically, Airvoice utilizes the Melissa Data program to validate the residential address provided by the applicant. <http://www.melissadata.com/> (retrieved May 15, 2012). The BeQuick Fusion program allows Airvoice to crosscheck for duplicates within Airvoice’s existing customer database and to establish customer accounts in real time. <http://www.bqsoft.com/2012/05/1455/> (retrieved May 15, 2012). Additionally, Airvoice has engaged CGM, LLC, a software firm servicing telecom providers. <http://www.cgmlc.net/> (retrieved May 15, 2012).

by CGM, LLC.¹⁴ The AAR will also review any available federal or state databases to determine if the applicant is receiving a Lifeline benefit from another provider. If the applicant is not currently receiving a Lifeline benefit, the application will be approved, a customer account will be created immediately (via BeQuick), and the applicant will be provided with a handset. The AAR will guide the customer through the activation of the handset and completion of the initial outgoing call.

To complete the enrollment, an AirVoice quality assurance manager (AQAM) will independently review each application, and all documentation supporting identity and eligibility within the CGM enrollment application review queue. The CGM review queue will allow the AQAM to view and confirm the captured image of the government issued ID and the proof of eligibility documentation, assuring that they match the information entered on the enrollment form. Once the AQAM has verified the enrollment, the image of proof of eligibility will be deleted. Only enrollments that successfully complete this two-step process (AAR and AQAM) will be submitted for reimbursement. This ensures that an Airvoice employee directly oversees and finalizes every Lifeline enrollment.

Customers who do not complete the application process in person must return the signed application and copies of supporting documentation to the Company by mail, fax, email or other electronic transmission. The Company will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any applicable state laws and may verify signatures via interactive voice response systems. Processing of consumers' applications, including review of all application forms,

¹⁴ Additionally, Airvoice has engaged CGM, LLC, a software firm servicing the billing needs of telecom providers. <http://www.cgmlc.net/> (retrieved May 15, 2012).

crosschecking all databases and relevant documentation, will be performed under Airvoice's supervision by personnel experienced in the administration of the Lifeline program. Airvoice will ensure that all required documentation is taken care of properly by using, when available, state-specific compliance checklists. Once the application has been approved, a handset will be mailed, requiring a signature upon delivery, to the applicant at their residential address. The applicant must contact Airvoice customer service to confirm receipt of the handset, and provide last four digits of Social Security number as proof of identity, prior to having handset activated.

The application process for applying for a Lifeline benefit via telephone is similar to the retail setting described above. Applicants will be informed by an ACSR of the qualification, documentation and certification requirements for the Lifeline benefit and may be directed to the Company's website for additional information. The ACSR will employ a script similar to that provided hereto as Exhibit B. The ACSR will determine, based on the applicant's responses and a crosscheck of all databases, if they qualify for the Lifeline benefit. If the applicant qualifies for the Lifeline benefit, they will be obligated to provide (via facsimile, email, text or U.S. mail) copies of the supporting documentation prior to final approval for service.¹⁵ Upon final approval, a handset will be mailed, requiring a signature upon delivery, to the applicant at their residential address. The applicant must contact Airvoice customer service in order to confirm receipt of the handset. Customer service will assist in the activation of the handset and completion of the initial outgoing call. In the event the applicant does not qualify, the ACSR will explain the reason for denial of service.

¹⁵ In the future, the conversation between the ACSR and the applicant, specifically the applicant's responses to the certification statements, may, in some instances, may be recorded, through the use of an interactive voice response system ("IVR"), as supporting documentation.

The online application process requires an applicant to review the qualification, documentation and certification requirements as they move through progressive screens on the Company's website. The website will provide in clearly written and easily distinguishable language all the requisite information defined in the *Order*, including but not limited to, that Lifeline is a non-transferable government benefit, limited to one-per-household, with household clearly defined, requires supporting documentation and ongoing recertification obligations and is subject to penalties and imprisonment for fraud. Hereto, the applicant will be required to submit copies of supporting documentation to the Company prior to the receipt of a handset and provision of service. Once the applicant's application has been approved, a handset will be mailed, requiring a signature upon delivery, to the applicant at their residential address. The applicant must contact Airvoice customer service in order to confirm receipt of the handset. Customer service will assist in the activation of the handset and completion of the initial outgoing call. In the event the applicant does not qualify, Airvoice will notify the applicant in writing regarding the reason for denial of service.

Airvoice shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that the procedures it will implement will prevent Airvoice customers from engaging in such abuse of the program, inadvertently or intentionally. As indicated above, and prior to initiating service for a customer, the Company will confirm the identity, residential address and program eligibility of each applicant. Prior to requesting a subsidy, Airvoice will process and validate Airvoice's subsidy data and confirm that each consumer's handset has been activated and is in use to prevent: (1) Duplicate Same-Month Lifeline Subsidies ("Double Dip," i.e., any household that is already receiving a Lifeline subsidy from Airvoice will be automatically prevented from receiving a

second lifeline subsidy in that same month); and (2) Inactive lines receiving subsidy (i.e., systems compare all subsidy requests to underlying network status to ensure that subsidies are requested only for active lines).

Notwithstanding the foregoing with respect to program or income eligibility, for states that require Airvoice to enroll subscribers identified by the state or as eligible in a state or federal database, Airvoice may continue to rely on the state or federal identification or database. Where Airvoice can access a state or federal database to make determinations about customer eligibility, the Company is not required to obtain further documentation but will note in its records what data was relied upon to confirm the customer's eligibility for Lifeline and the date it reviewed such data. Where a state agency or third-party administrator is responsible for the initial determination of eligibility, Airvoice will rely on the state identification or database.

C. Annual Verification Procedures

As required by the Commission's *Order*, Airvoice will require every consumer enrolled in the Lifeline program to verify on an annual basis that they 1) continue to be eligible for Lifeline service, 2) only receive Lifeline service from Airvoice, and 3) to the best of his or her knowledge, no one else at the subscriber's household is receiving a Lifeline supported service.¹⁶ Airvoice will re-certify the eligibility of its Lifeline subscriber base (if any) as of June 1, 2012 by the end of 2012 and report those results to USAC by January 31, 2013. Airvoice will notify each participating Lifeline consumer prior to their service anniversary date that they must confirm their continued eligibility in accordance with the applicable requirements. This notification will

¹⁶ Airvoice customer service representatives are available, toll free, to respond to any questions (including recertification and status changes) and requests for de-enrollment. Additionally, de-enrollment may be requested in person at any of Airvoice's retail agent locations.

be mailed via the U.S. Postal Service to the address the subscriber has on record with Airvoice. Airvoice will also notify customers in advance of their anniversary date via a free text message. The mailed notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact Airvoice to complete the verification. Customers will have 30 days to complete the form, certify under penalty of perjury that they continue to be eligible for Lifeline service, receive Lifeline service only from Airvoice, and return the form to Airvoice by mail. Anyone who does not respond to the mailing, certifying their continued eligibility, will be removed from the Lifeline program. Certification may also be obtained through an IVR system or a text message. In states where a state agency or third party has implemented a database that carriers may query to re-certify eligibility, the Company will query the database and maintain a record of what data was used to re-certify eligibility and the date of re-certification.

Currently, customers will be required to complete the verification process by mail; however, Airvoice may offer additional options, such as web-based methods, in the future. Such verification will be required in order for the consumer to continue to receive free Lifeline service or to purchase prepaid airtime from the Company at the discounted rate only available to those customers who are enrolled in its Lifeline program. The Company will notify subscribers in writing of service termination for not responding to the annual certification within 30 days. Anyone who does not respond has 30 days to demonstrate that his or her Lifeline service should

not be terminated; or will otherwise be de-enrolled within five days following the 30-day recertification period.¹⁷

IV. Additional Measures to Prevent Waste, Fraud, and Abuse

A. Non-usage Policy

Airvoice will implement a non-usage policy whereby it will identify Lifeline customers that have not used the Company's Lifeline service for 60 days, and cease to claim Lifeline reimbursements for such customers if they do not use their service within a 30-day grace period following the initial 60-day non-usage period. Specifically, if no usage appears on an Airvoice Lifeline customer's account during any continuous 60-day period, Airvoice will promptly notify the customer that the customer is no longer eligible for Airvoice Lifeline service subject to a 30-day grace period. During the 30-day grace period, the customer's account will remain active, but Airvoice will engage in outreach efforts to determine whether the customer desires to retain the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the grace period (such as making or receiving a voice call, sending a text message and/or adding money to the account), Airvoice will deactivate Lifeline services for that customer.¹⁸ In addition, Airvoice will not seek to recover a Federal Universal Service Fund subsidy for the minutes provided to the customer during the grace period or thereafter report that customer on its USAC Form 497 unless the customer reinitiates service.

¹⁷ As indicated in Section IV (C), Airvoice will update the requisite databases within one day of de-enrollment. Additionally, the Company will provide de-enrollment information (in month-to-month detail) to the Commission on an annual basis. *Order* at ¶ 206.

¹⁸ *Id.*

B. Customer Education with Respect to Duplicates

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Airvoice will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.

- a) Call Center Scripts – Airvoice will emphasize the “one Lifeline phone per household” restriction through its interaction with the potential customer at the call center. (See Exhibit B)
- b) Marketing, Advertising and Website Content – Airvoice, in its marketing materials, will reinforce the limitation of one Lifeline phone per household. The following statement will appear in conspicuous place in bold font in an offsetting color, minimum 10 point font, to ensure it is not overlooked. (See Exhibit C – sample marketing materials).

Note: LIMIT ONE LIFELINE PHONE PER HOUSEHOLD (Either Wireline or Wireless Service).

This statement will also appear on the company’s website during the customer information/education cycle. At the point on its website when a customer inputs his/her zip code to verify that Airvoice offers service in their area, Airvoice would display the above message in the section where the website explains the service.

C. Cooperation with state and federal regulators

Airvoice has and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- Providing state commissions (PUC), the FCC or USAC upon request with data that will enable that state, the FCC or USAC to determine whether some consumers are enrolled in more than one Lifeline program. Specifically, Airvoice agrees to make available state-specific customer data, including name and address, upon request to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;
- Promptly investigate any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivate a customer's Lifeline service and no longer report that customer on USAC Form 497 if Airvoice's investigation, a state, the FCC or USAC concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations and that Airvoice's Lifeline service should be discontinued such as a de-enrollment notification pursuant to the FCC's June 17, 2011 Report and *Order* (Section III, B.).
- Airvoice agrees to comply with all certification requirements when submitting for reimbursements from USAC.¹⁹

V. Lifeline Rate Plans

Airvoice offers the following rate plan, which is free to eligible Lifeline subscribers.²⁰

¹⁹ See, for example, *Order* at ¶¶ 125-128.

250 Free Minutes and a Free Phone: This plan includes a phone plus 250 free voice minutes.

Unused minutes expire at the end of the last day of their cycle. The account is then automatically replenished with the next month's 250 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes billed at \$.10 per minute. This plan includes nationwide coverage, voice mail, call waiting, three way calling, call forwarding and Caller ID. There is no additional charge for toll calls. Calls to 911 and Airvoice customer care are free. Lifeline customers also have the option, for an additional fee, to purchase the text and data plans that are available to all Airvoice customers.

VI. Geographic Service Area

Airvoice expects to apply for ETC status in the following states and to provide service to Lifeline eligible residents: Michigan, Wisconsin, Texas, Pennsylvania, California and the 10 Federal Jurisdiction States.

²⁰ Order at ¶ 390.

CONCLUSION

Airvoice submits that this amended Compliance Plan fully satisfies the conditions set forth in the Commission's *Order* granting forbearance to the Company. The aforementioned policies and procedures are in place to safeguard against misuse of the Company's Lifeline services, as well as to prevent waste, fraud, and abuse of the Lifeline program. Airvoice's procedures also ensure public safety by ensuring access to 911 and E911 services. Consequently, Airvoice respectfully requests that the Commission expeditiously approve this Compliance Plan so that Airvoice may begin providing the benefits of much-needed Lifeline service to qualifying low-income consumers.

Respectfully submitted,

AIRVOICE WIRELESS, LLC

/s/

Glenn S. Richards
Christine A. Reilly
Pillsbury Winthrop Shaw Pittman LLP
2300 N Street NW
Washington D.C. 20037
(202) 663-8215

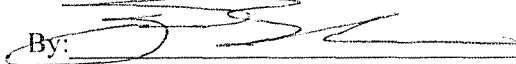
Its Counsel

December 7, 2012

VERIFICATION

I hereby verify that I have read the foregoing Airvoice Wireless, LLC Amended Compliance Plan; and that to the best of my knowledge, information and belief the information stated therein is true and accurate.

Airvoice Wireless, LLC

By: 

Title: CEO Tim BAHRI

Exhibit A

LIFELINE APPLICATION

FEEL SAFE WIRELESS LIFELINE APPLICATION



This signed authorization is required in order to enroll you in the Lifeline Program in your state. This authorization is only for the purpose of verifying your participation in these programs and will not be used for any other purpose. Service requests will not be processed until this form has been received and verified by our Company.

Things to know about the Lifeline Program:

1. Lifeline is a Federal Benefit.
2. Lifeline Service is available for only one line per household. A household cannot receive benefits from multiple providers.
3. A household is defined, for purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses.

Applicant Information:

First Name: _____ MI: _____ Last Name: _____ Date of Birth: Month (DOB) _____ Day _____ Year _____

Social Security Number (SSN – last four digits only) Or Tribal ID #: _____ Contact Telephone Number: _____

Residence Address (No P.O. Boxes, Must be your principal address): This address is ☐ Permanent ☐ Temporary ☐ Multi-Household

_____ Apt/Floor/Other _____ City: _____ State _____ Zip Code: _____

Billing Address (May Contain a P.O. Box)

_____ Apt/Floor/Other _____ City: _____ State _____ Zip Code: _____

I hereby certify that I participate in at least one of the following programs: (Check all that apply)

- _____ Supplemental Nutrition Assistance Program (SNAP)
- _____ Supplemental Security Income (SSI)
- _____ Federal Public Housing Assistance
- _____ Low-Income Home Energy Assistance Program (LIHEAP)
- _____ National School Lunch Program
- _____ Temporary Assistance for Needy Families (TANF)
- _____ Medicaid

_____ I certify that my household income is at or below 135% of the Federal
(Initial Here) Poverty Guidelines (FPG). There are _____ individuals in my household.

You must provide documented proof of your participation in the above programs or your income.

I certify, under penalty of perjury: (Initial by Each Certification)

1. The information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.
2. I am a current recipient of the program checked above, or have an annual household income at or below 135% of the FPG.
3. I have provided documentation of eligibility if required to do so.
4. I understand that I and my household can only have one Lifeline supported telephone service. Feel Safe Wireless has explained the one-per household requirement. I understand that violation of the one-per household requirement constitutes a violation of the FCC's rules and will result in my de-enrollment from the Lifeline Program, and could result in criminal prosecution by the United States Government.
5. I attest to the best of my knowledge, that I and no one in my household is receiving a Lifeline supported service from any other land line or wireless company such as Assurance, Safelink or Reachout Wireless.
6. I understand my Feel Safe Wireless Lifeline service is non-transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
7. I understand that if my service goes unused for sixty (60) days, my service will be suspended and subject to a thirty (30) day period during which I may use the service or contact Feel Safe Wireless to confirm that I want to continue receiving their service.
8. I will notify Feel Safe Wireless within thirty (30) days if I no longer qualify for Lifeline. I understand this requirement and may be subject to penalties if I fail to notify my phone company. Specifically, I will notify my company if:
 - a. I cease to participate in the above federal or state program, or my annual household income exceeds 135% of the Federal Poverty Guidelines.
 - b. I am receiving more than one Lifeline supported service
 - c. I no longer satisfy the criteria for receiving Lifeline support
- 9.) I will notify Feel Safe Wireless within thirty (30) days of moving. Additionally, if my address listed above is a temporary address, I understand that I must verify my address with Feel Safe Wireless every ninety (90) days. If I fail to respond to Feel Safe Wireless' address verification attempts within thirty (30) days, my Feel Safe Wireless Lifeline service may be terminated.
10. Feel Safe Wireless has explained to me that I am required each year to re-certify my continued eligibility for Lifeline. If I fail to do so within thirty (30) days, it will result in the termination of my Feel Safe Wireless Lifeline service.
11. I acknowledge, and consent to, that certain information, including my name, DOB, last four digits of SSN or Tribal government identification number, address, telephone number and e-mail will be provided to the Lifeline Administrator for purposes of determining duplicate services.

Applicants Signature

Date

Certification is good for up to one (1) year from the date of signing. This certification must be updated annually to avoid program termination.

FOR OFFICE USE ONLY:

Company Representative:

Documentation Verified:

Representative Signature:

Date:

Is this a multi-family dwelling? _____

Exhibit B

CALL CENTER SCRIPTS

1. Thank you for calling Airvoice Wireless, how may we assist you today?
2. I will be able to assist you in the enrollment process. I will need to ask you some questions to get started. Is that ok?
3. Is there anyone currently residing in the home that is receiving Lifeline benefits for wireless or home phone service from any other companies such as Assurance, Safelink or Reachout Wireless? Is this individual part of your household [explain definition of "household"¹⁹]?

If no, proceed to #4.

If yes, Lifeline service is only available to one person per residence. If you would like to receive Lifeline service from Airvoice Wireless, please contact your current Lifeline provider and cancel the service. Once you cancel that service, please contact us to set up your Airvoice Wireless service. Or you must separately certify, in writing (use USAC form), that those individuals do not contribute income to your household OR share your household expenses.

4. Now sir/ma'am in order to receive the Airvoice Wireless Lifeline service, you must be enrolled in select government assistance programs. Are you currently participating in any government assistance programs? If, so, which one? Or is your income 135% below the Federal Poverty Guide Lines? If yes, proceed to #5.
5. Participating in the [insert program here] program enables you to receive the Airvoice Wireless Lifeline service. The Airvoice Wireless Lifeline service will provide you with a free wireless phone and 250 monthly voice minutes.
6. *(Enrollment Representative takes customer's information and checks against database, prior to entering the enrollment process)*
 - May I please have your first name?
 - Middle Initial (optional)
 - May I please have your last name?
 - May I please have your mailing address? (must be residential, not PO Box)

¹⁹ A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. *Order at ¶74.*

- Is your billing address the same? If not, please provide your billing address.
 - May I please have your contact phone number, if available?
 - May I please have your email address?
 - What are the last 4 digits of your social security number or your Tribal government identification card number? This is required to check the status on your application and for security verification purposes.
 - What is your date of birth? This is also required for verification purposes.
 - What is the government assistance program from which you receive assistance?
- Proceed to #7.

7. Now that we have verified all of your information, we can complete your enrollment. In order to do so:

(At this point the Enrollment Representative will ask self-certification questions in 3 parts to ensure the customer understands)

8. DO YOU CERTIFY UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED WITHIN THIS APPLICATION IS TRUE AND CORRECT TO THE BEST OF HIS OR HER KNOWLEDGE AND THAT NO OTHER MEMBER IN YOUR HOUSEHOLD CURRENTLY RECEIVES LIFELINE ASSISTANCE?

- Customer must answer YES to continue.

9. DO YOU UNDERSTAND THAT YOU MAY BE REQUIRED TO VERIFY YOUR CONTINUED ELIGIBILITY FOR AIRVOICE WIRELESS SERVICE AT ANY TIME? FAILURE TO VERIFY ELIGIBILITY WILL RESULT IN TERMINATION OF AIRVOICE WIRELESS SERVICE. IN THE FUTURE, IF YOU ARE NO LONGER ELIGIBLE TO RECEIVE BENEFITS FROM AT LEAST ONE OF THE QUALIFYING STATE OR FEDERAL ASSISTANCE PROGRAMS OR YOUR INCOME EXCEEDS MORE THAN 135% OF THE FEDERAL POVERTY GUIDELINES, AS PREVIOUSLY EXPLAINED TO YOU, YOU WILL NOTIFY AIRVOICE WIRELESS WITHIN THIRTY (30) DAYS.

- Customer must answer YES to continue

10. DO YOU UNDERSTAND THAT IF APPROVED FOR LIFELINE SERVICE, YOUR PERSONAL INFORMATION, INCLUDING NAME, DATE OF BIRTH, LAST FOUR DIGITS OF YOUR SOCIAL SECURITY NUMBER OR TRIBAL IDENTIFICATION CARD NUMBER, ADDRESS, WILL BE PROVIDED TO THE LIFELINE PROGRAM ADMINISTRATOR FOR PURPOSES OF DETERMINING DUPLICATE SERVICES.

- Customer must answer YES to continue

11. DO YOU ACKNOWLEDGE THAT PROVIDING FALSE OR FRAUDULENT DOCUMENTATION IN ORDER TO RECEIVE ASSISTANCE IS PUNISHABLE BY LAW AND THE PENALTIES OF PERJURY INCLUDE MONETARY FINES AND POTENTIAL IMPRISONMENT

- Customer must say YES to continue

If at any point, the customer says “No” to the self-certification questions, the Enrollment representative will explain that the customer does not qualify for the Airvoice Wireless Lifeline program.

Exhibit C

MARKETING MATERIALS

Additional Airtime

FEEL SAFE
REFILL PIN
\$10

| | |
|-----------------------------|-----------------------------|
| Minutes or SMS | 100 |
| Voice Calls | \$0.10 per Minute |
| Text Messaging | \$0.10 per Message |
| Multimedia Messaging (MMS)* | \$0.10 per Message |
| Data/Web* | \$0.33 per MB |
| International SMS | \$0.20 per Outgoing Message |
| International MMS* | \$0.20 per Outgoing Message |
| International Calling | Rates vary per Country |

FEEL SAFE
REFILL PIN
\$20

(\$5 BONUS ADDED)
\$25 worth of funds

| | |
|-----------------------------|-----------------------------|
| Minutes or SMS | 250 |
| Voice Calls | \$0.10 per Minute |
| Text Messaging | \$0.10 per Message |
| Multimedia Messaging (MMS)* | \$0.10 per Message |
| Data/Web* | \$0.33 per MB |
| International SMS | \$0.20 per Outgoing Message |
| International MMS* | \$0.20 per Outgoing Message |
| International Calling | Rates vary per Country |

*Compatible Phone required to use MMS and Data Features

Qualifying for FEEL SAFE WIRELESS is Easy! Just make sure you meet the following eligibility requirements and you will be able to receive your FREE FEEL SAFE WIRELESS phone with 250 FREE MONTHLY voice minutes:

1. Limit one Lifeline phone per household (either wireline or wireless service).
2. FEEL SAFE WIRELESS Lifeline benefits are available to consumers who use any of the following government assistance programs or have an income that is at or below 135% of the Federal Poverty Guidelines (FPG).

Food Stamps
Medicaid
Federal Public Housing Assistance- Section 8
National School Free Lunch Program
Bureau of Indian Affairs Programs
Supplemental Social Security- SSI
Temporary Assistance to Needy Families- TANF
Low Income Home Energy Assistance Program- LIHEAP

Proof of Participation or Household Income is required to get service. In order to maintain your Lifeline Service, you must verify your enrollment information annually.

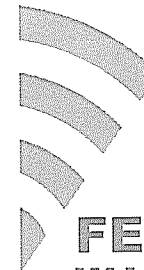
3. Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline Service is Non-Transferable.

Note: Programs vary by state.
Please visit FeelSafeWireless.com for complete details.

In order to maintain your Lifeline Service, you must verify your enrollment information annually.

AVAILABLE FEATURES

- 911/E911 Access
- Voicemail Account
- Caller ID
- Call Waiting
- 3 Way Calling
- Text Messaging
- Call Forwarding
- Free Calls to Customer Service



**FEELSAFE
WIRELESS**

Brought to you by
AIRVOICE
wireless

**FREE
PHONE
with 250
FREE
minutes every
month**

LIMIT ONE LIFELINE
PHONE PER HOUSEHOLD
Either Wireline or Wireless Service

On The Most Reliable GSM Network
1-877-247-7799
FeelSafeWireless.com

How to Use Your Features

Customer Service

Dial 611 SEND from your mobile phone or 1-877-247-7799 from any other phone to get connected to Customer Service

411 Dialing

Dial 1800FREE411 at anytime to get directory assistance services for regular airtime charges! Simply dial the toll-free number, say where you are and what you are looking for, and get connected. It's that simple!

To Set Up your Voicemail

1. From wireless phone, dial your cellular number or press and hold the "1" key.
2. The system will ask you to enter your personal pass code (think of any easy number to remember for a pass code and enter it when prompted).
3. The system will prompt you to record your own personal greeting or select a standard greeting.

To Listen to your Messages

1. Dial your wireless phone number from your wireless phone or any other touch-tone phone or press and hold the "1" key.
2. Press * to interrupt the greeting.
3. Enter your pass code
4. The system will automatically play the new voice messages

Call Waiting

Call waiting allows you to answer a second call while another call is in progress. To use Call Waiting:

1. Press SEND to answer the second call
2. To alternate between calls, continue to press SEND

Caller ID

Caller ID shows you the phone number of most incoming calls. If you don't want to answer your wireless phone and you have voicemail, you can let the incoming call roll to your Voicemail Box. Caller ID works whenever your phone is powered on. It even works when Call Waiting alerts you of an incoming call.

Three-Way Calling

This service lets another person join a call to make a three-way conversation. To setup Three-Way Calling:

1. Dial the 10 digit phone number of the third party, while the original party is on the phone.
2. Press SEND, which dials the third party and puts your original call on hold.
3. To establish the three-way call, press SEND again after the third party answers.
4. If the third party is busy or does not answer, press SEND once to disconnect the third party.
5. To disconnect from the third party in a three-way call, press SEND once.
6. To disconnect from the original party in the three-way call, the original party must hang up.

Airtime charges will apply for all calls when using this feature.

Call Forwarding

With Call Forwarding, all your incoming calls will be forwarded to the phone number you specify.

To Activate Call Forwarding:

1. Scroll through the menu and select Settings
2. Scroll down and select Call Settings or Call Manager
3. Scroll Down and select Forward Calls
4. Select Voice Calls
5. Select Always Forward
6. Select Activate
7. Enter the 10 digit number to forward all calls to and select OK
8. Call Forwarding will remain active until you deactivate the feature

To Deactivate Call Forwarding:

1. Scroll through the menu and select Settings
2. Scroll down and select Call Settings or Call Manager
3. Scroll Down and select Forward Calls
4. Select Voice Calls
5. Select Always Forward
6. Select Cancel
7. Select OK

Text Messaging (SMS)

Text Messaging (SMS) allows you to send or receive short alphanumeric messages (up to 150 characters in length) using your wireless phone. Text messaging service also includes e-mail and web-based messaging. Your unique e-mail address is your 10 digit wireless number@txt.att.net. For Example: If your number is (555)123-4567, your e-mail address is 5551234567@txt.att.net

Multimedia Messaging (MMS)*

Multimedia Messaging allows you to send or receive messages that include media such as pictures, videos or sounds using your wireless phone. Use of this feature requires an MMS compatible phone as well as the appropriate MMS feature on your Feel Safe Wireless account. You can exchange Multimedia messages with any compatible phone by addressing the message to your recipient's 10-digit mobile number. You can also send Multimedia Messages to email addresses. Multimedia messages sent to non-MMS capable phones will be delivered as a text message instructing the recipient on how to view the message online.

Mobile Web (Data)*

The Mobile Web or Data provides you with Internet Access on your mobile device. Use of this feature requires a Data compatible phone as well as the appropriate Data Feature on your Feel Safe Wireless account. Please note, although you may attempt to view any webpage using your mobile phone, not all websites are formatted for mobile devices. You may experience delays as well as the inability to access certain websites when using the internet on your mobile phone.

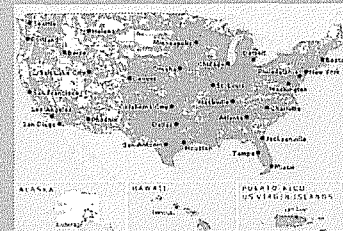
*A \$10 or \$20 Feel Safe Wireless Refill card and a Compatible handset are required to use these features.

Feel Safe Wireless Terms of Service

1) **Service Availability:** Service is available only if you are within the Feel Safe Wireless GSM coverage area. Service may be interrupted due to system capacity limitations and system repairs or modifications. Service is subject to limitation or interruption caused by weather, terrain, obstructions such as trees or buildings or other conditions. Feel Safe Wireless is not responsible for time lost or days lost for interruption of service caused by above mentioned. There will be no credits or refunds issued for any reason. 2) **Use of Device:** Only Certified & Approved Unlocked 850/1900 MHz GSM phones are compatible with Feel Safe Wireless service. 3) **Right to Terminate Service:** We reserve the right to cancel, suspend or restrict service to your number, without notice if we suspect fraudulent, illegal or abusive activity, abnormally high amounts of usage, failure to maintain an appropriate account balance for applicable charges, for harassing our employees and/or harassing other Avoice customers. Some examples of fraudulent activity include Traffic Pumping and Spam Messaging. We reserve the right to cancel accounts for fraudulent activity based on voice calls, SMS, MMS and data usage. 4) **Release of Information:** Feel Safe Wireless may release information about your account when we believe release is appropriate to comply with the law (i.e. subpoena, court order, E911 information, etc.). There will be no call histories released to customers for any reason. 5) **PUK Codes:** Please contact our US based customer service at 1-877-247-7799 if your phone asks for a PUK code. Do not attempt guessing any code because it will disable your SIM card. 6) **Phone Codes:** If your phone is asking for ANY codes you are not aware of, do not attempt guessing any codes because it may disable your SIM card. You will need a new Non-Active Feel Safe Wireless SIM card if you disable your SIM card. 7) **Account Information:** Any person that is able to verify your mobile number, SIM card number and/or account information is authorized by you to make changes to your account. 8) **Ability to change services:** You will have the ability to change from one Feel Safe Wireless rate plan to another upon request if proper verification is provided. Please contact our US based customer service at 1-877-247-7799. 9) **Cancellation Policy:** Cancellation requests should be put in writing, faxed to (248) 239-0182. You will lose any remaining airtime on your account. Feel Safe Wireless will not provide a refund or credit for any remaining airtime lost. 10) **Porting Policy:** You are able to port your number out of Feel Safe Wireless to other carriers. Feel Safe Wireless does not guarantee that number transfers to or from our company will be successful. If you request to port your number out to another company, that is considered a request by you to terminate all of the services associated with that number. Your remaining airtime will be forfeited and you will not receive a credit for the remaining balance. Feel Safe Wireless will not release your wireless number to another carrier without proper verification. If you are attempting to change service providers, you will need to verify your four-digit pin as well as your Feel Safe Wireless SIM card number, which is your account number, in order to transfer your account. Your account must be in an active status in order to port out. 11) **Charges:** You will be billed regular airtime charges for calls made to 800, 866, 877, 888 and all other toll free calls. Domestic long distance calls will be billed at regular airtime charges. Calls to international numbers will be billed at a higher rate (call customer service for rates). For all calls, the length of the call will be measured during the time that you are connected to our system, which is approximately from the time you press "SEND" or other key to begin a call until approximately the time you press "END" key to terminate the call. Airtime usage on each call is deducted in full minute increments, with partial minutes of use rounded up to the next full minute. Unanswered calls lasting 30 seconds or more will be charged standard airtime and rounded up to the nearest minute. Features such as call waiting, 3-way calling, call forwarding and voicemail will incur applicable airtime charges. 12) **Account Balance:** All calls will be automatically deducted from your account balance. Balances are not transferable or refundable. Airtime cannot be moved from one phone number to another phone number. You should take reasonable efforts to safeguard your phone and Refill airtime costs. Refill Airtime expires "X" amount of days after a refill card is added to your account whether you use the airtime or not. 13) **Use of Service/Features:** International rates vary and are subject to change without notice. It is always best to contact customer service for up to date rates and available countries. You cannot use our service to place calls to numbers that begin with 500, 700, 855, 900 or 976. You cannot use the service to place operator assisted calls such as third party billed, and collect calls. If you are unable to successfully place a call out, attempt dialing with 1 + the area code + the 7-digit number. It is highly recommended that you power cycle your phone at least once per day to help re-register our phone within the Network. 14) **Disputes:** All disputes must be submitted within 30 days. Feel Safe Wireless is not responsible for disputes that occurred more than 30 days from the date of the dispute. 15) **Multimedia Messaging:** Multimedia Messaging service is an optional feature available to Feel Safe Wireless customers if a Feel Safe Wireless Refill card is added. This service will only work if used with a compatible handset and proper Feel Safe Wireless MMS configuration settings. Customers without MMS capable handsets will not receive credit for inability to send/receive multimedia messages. You should verify that your phone is MMS compatible before using this feature. Any Multimedia Message you attempt to send or receive will deduct 20 cents from your account balance, whether it is successfully delivered or not. You may attempt to download ring tones and games via Multimedia messaging. Feel Safe Wireless is not responsible if you are unable to download, or save ring tones, games or other multimedia content to your wireless device. You will still be charged for data used when attempting to download content, especially those that are not formatted for wireless devices, or contain high graphic content. Feel Safe Wireless is not responsible for slow loading time when using data services, and will not issue credits for this reason.

National Coverage Map

Our coverage area may vary. Please contact customer service at 1-877-247-7799 or visit www.FeelSafeWireless.com for the most up to date coverage area information.



Prepaid Coverage Legend

- National Prepaid Coverage
- No Service Available

Important Information About the Coverage Map

This map shows approximately where our wireless coverage is available. Cellular service may be affected by such things as terrain, weather, foliage, building structures and your equipment. The map does not guarantee service availability.

Send and receive MMS messages as a combination of text, photos, animations, video or sound on compatible handsets. Not all MMS handsets support all features of the service. MMS customers cannot send and receive messages in MMS format with other mobile customers who do not have an MMS compatible handset and/or are not activated. If a Feel Safe Wireless MMS message is sent to a mobile handset that cannot receive the message in MMS format, the recipient will need to have an SMS compatible handset and service to receive the message. The recipient can access the message via the website for up to 7 days before deletion. Please note, you will still be charged an MMS message even if the recipient does not have MMS. There may be a delay between when a message is sent and when it is received. Feel Safe Wireless accepts no liability for any loss or damage as a result of a delay in receiving a message, a message not being sent or non delivery of a sent message. Recipients of your sent message must be within the coverage of their participating supplier's mobile network to receive a Multimedia message. If a recipient's phone is turned off, or out of their coverage area, the multimedia message is not considered sent, and you will still be charged 20 cents for the message. 16) **Mobile Web/Data:** Mobile Web or Data service is an optional feature available to Feel Safe Wireless customers if a Feel Safe Wireless Refill Card is added. This service will only work on compatible handsets that offer a web browser and handsets that are properly configured with Feel Safe Wireless data settings. It is your responsibility to ensure that your device is data capable. Data is measured and billed per KB, at \$0.002325/KB. There are 1024 KB in one MB of data. Using one MB of data will result in a \$0.002325/KB. A data session consists from the time you access the Internet via the mobile device until you terminate the session. Multiple sessions can be initiated within a 24 hour period; each will be charged per KB you use, and billed as separate events. You are responsible to manage your data settings. If you fail to end a session, the internet will still be reconnected connected on your device, and your account will still be charged \$0.002325/KB. Failure to log off of the internet will result in depletion of your airtime. Feel Safe Wireless will NOT issue credits for this reason. You may attempt to download ring tones and games via the Mobile Web. Feel Safe Wireless is not responsible if you are unable to download, or save ring tones, games or other multimedia content to your wireless device. You will still be charged for data used when attempting to download content, especially those that are not formatted for wireless devices, or contain high graphic content. Feel Safe Wireless is not responsible for slow loading time when using data services, and will not issue credits for this reason.

* All information is subject to change at any time with or without notification. Because of frequent network updates, sometimes rates and other information may change. It is best to call our U.S. based customer service at 1-877-247-7799 or visit our website www.FeelSafeWireless.com for up to date information.

FEELSAFE WIRELESS

Brought to you by 
AIRVOICE
wireless



FREE PHONE!

LIMIT ONE LIFELINE PHONE PER HOUSEHOLD
(Either Wireline or Wireless Service)

250 FREE

minutes every month

AVAILABLE FEATURES

- 911/E911 Access
- Voicemail Account
- Caller ID
- Call Waiting
- 3 Way Calling
- Text Messaging
- Call Forwarding
- Free Calls to Customer Service

On The Most Reliable GSM Network

1-877-247-7799

FeelSafeWireless.com

QUALIFYING for FEEL SAFE

WIRELESS is Easy! Just make sure you meet the following eligibility requirements:

1. Limit one Lifeline phone per household (either wireline or wireless service).
2. FEEL SAFE WIRELESS Lifeline benefits are available to consumers who use any of the following government assistance programs or have an income that is at or below 135% of the Federal Poverty Guidelines (FPG).

Food Stamps

Medicaid

Federal Public Housing Assistance- Section 8

National School Free Lunch Program

Bureau of Indian Affairs Programs

Supplemental Social Security- SSI

Temporary Assistance to Needy Families-
TANF



Low Income Home Energy Assistance
Program- LIHEAP

Proof of Participation or Household Income is required to get service. In order to maintain your Lifeline Service, you must verify your enrollment information annually.

3. Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline Service is Non-Transferable.



Prepaid Coverage Legend

-  National Prepaid Coverage
-  No Service Available

Important Information About the Coverage Map

This map shows approximately where our wireless coverage is available. Cellular service may be affected by such things as terrain, weather, foliage, building structures and your equipment. The map does not guarantee service availability.

Exhibit D

LIFELINE SERVICE PLAN

Airvoice offers the following rate plan, which is free to eligible Lifeline subscribers.

250 Free Minutes and a Free Phone: This plan includes a phone plus 250 free voice minutes. Unused minutes expire at the end of the last day of their cycle. The account is then automatically replenished with the next month's 250 free voice minutes. If a subscriber runs out of minutes, they have the option to purchase additional voice minutes billed at \$.10 per minute. This plan includes nationwide coverage, voice mail, call waiting, three way calling, call forwarding and Caller ID. Calls to 911 and Airvoice customer care are free. Lifeline customers also have the option, for an additional fee, to purchase the text and data plans that are available to all Airvoice customers.

EXHIBIT “H”

MARKETING MATERIALS

Additional Airtime

FEEL SAFE
REFILL PIN
\$10

| | |
|-----------------------------|-----------------------------|
| Minutes or SMS | 100 |
| Voice Calls | \$0.10 per Minute |
| Text Messaging | \$0.10 per Message |
| Multimedia Messaging (MMS)* | \$0.10 per Message |
| Data/Web* | \$0.33 per MB |
| International SMS | \$0.20 per Outgoing Message |
| International MMS* | \$0.20 per Outgoing Message |
| International Calling | Rates vary per Country |

FEEL SAFE
REFILL PIN
\$20

(\$5 BONUS ADDED)
\$25 worth of funds

| | |
|-----------------------------|-----------------------------|
| Minutes or SMS | 250 |
| Voice Calls | \$0.10 per Minute |
| Text Messaging | \$0.10 per Message |
| Multimedia Messaging (MMS)* | \$0.10 per Message |
| Data/Web* | \$0.33 per MB |
| International SMS | \$0.20 per Outgoing Message |
| International MMS* | \$0.20 per Outgoing Message |
| International Calling | Rates vary per Country |

* Compatible Phone required to use MMS and Data Features

Qualifying for FEEL SAFE WIRELESS is Easy!
Just make sure you meet the following eligibility requirements and you will be able to receive your FREE FEEL SAFE WIRELESS phone with 250 FREE MONTHLY voice minutes:

1. Limit one Lifeline phone per household (either wireline or wireless service).
2. FEEL SAFE WIRELESS Lifeline benefits are available to consumers who use any of the following government assistance programs or have an income that is at or below 135% of the Federal Poverty Guidelines (FPG).

Food Stamps
Medicaid
Federal Public Housing Assistance- Section 8
National School Free Lunch Program
Bureau of Indian Affairs Programs
Supplemental Social Security- SSI
Temporary Assistance to Needy Families- TANF
Low Income Home Energy Assistance Program- LIHEAP

Proof of Participation or Household Income is required to get service. In order to maintain your Lifeline Service, you must verify your enrollment information annually.

3. Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Lifeline Service is Non-Transferable.

Note: Programs vary by state.
Please visit FeelSafeWireless.com for complete details.

In order to maintain your Lifeline Service, you must verify your enrollment information annually.

AVAILABLE FEATURES

- 911/E911 Access
- Voicemail Account
- Caller ID
- Call Waiting
- 3 Way Calling
- Text Messaging
- Call Forwarding
- Free Calls to Customer Service



FREE
PHONE
with 250
FREE
minutes every
month

LIMIT ONE LIFELINE
PHONE PER HOUSEHOLD
Either Wireline or Wireless Service

On The Most Reliable GSM Network
1-877-247-7799
FeelSafeWireless.com

How to Use Your Features

Customer Service

Dial 611 SEND from your mobile phone or 1-877-247-7799 from any other phone to get connected to Customer Service

411 Dialing

Dial 1800FREE411 at anytime to get directory assistance services for regular airtime charges! Simply dial the toll-free number, say where you are and what you are looking for, and get connected. It's that simple!

To Set Up your Voicemail

1. From wireless phone, dial your cellular number or press and hold the "1" key.
2. The system will ask you to enter your personal pass code (think of any easy number to remember for a pass code and enter it when prompted).
3. The system will prompt you to record your own personal greeting or select a standard greeting.

To Listen to your Messages

1. Dial your wireless phone number from your wireless phone or any other touch-tone phone or press and hold the "1" key.
2. Press * to interrupt the greeting.
3. Enter your pass code
4. The system will automatically play the new voice messages

Call Waiting

Call waiting allows you to answer a second call while another call is in progress. To use Call Waiting:

1. Press SEND to answer the second call
2. To alternate between calls, continue to press SEND

Caller ID

Caller ID shows you the phone number of most incoming calls. If you don't want to answer your wireless phone and you have voicemail, you can let the incoming call roll to your Voicemail Box. Caller ID works whenever your phone is powered on. It even works when Call Waiting alerts you of an incoming call.

Three-Way Calling

This service lets another person join a call to make a three-way conversation. To setup Three-Way Calling:

1. Dial the 10 digit phone number of the third party, while the original party is on the phone.
2. Press SEND, which dials the third party and puts your original call on hold.
3. To establish the three-way call, press SEND again after the third party answers.
4. If the third party is busy or does not answer, press SEND once to disconnect the third party.
5. To disconnect from the third party in a three-way call, press SEND once.
6. To disconnect from the original party in the three-way call, the original party must hang up.
Airtime charges will apply for all calls when using this feature.

Call Forwarding

With Call Forwarding, all your incoming calls will be forwarded to the phone number you specify.

To Activate Call Forwarding:

1. Scroll through the menu and select Settings
2. Scroll down and select Call Settings or Call Manager
3. Scroll Down and select Forward Calls
4. Select Voice Calls
5. Select Always Forward
6. Select Activate
7. Enter the 10 digit number to forward all calls to and select OK
8. Call Forwarding will remain active until you deactivate the feature

To Deactivate Call Forwarding:

1. Scroll through the menu and select Settings
2. Scroll down and select Call Settings or Call Manager
3. Scroll Down and select Forward Calls
4. Select Voice Calls
5. Select Always Forward
6. Select Cancel
7. Select OK

Text Messaging (SMS)

Text Messaging (SMS) allows you to send or receive short alphanumeric messages (up to 150 characters in length) using your wireless phone. Text messaging service also includes e-mail and web-based messaging. Your unique e-mail address is your 10 digit wireless number@txt.att.net For Example: If your number is (555)123-4567, your e-mail address is 5551234567@txt.att.net

Multimedia Messaging (MMS)*

Multimedia Messaging allows you to send or receive messages that include media such as pictures, videos or sounds using your wireless phone. Use of this feature requires an MMS compatible phone as well as the appropriate MMS feature on your Feel Safe Wireless account. You can exchange Multimedia messages with any compatible phone by addressing the message to your recipient's 10-digit mobile number. You can also send Multimedia Messages to email addresses. Multimedia messages sent to non-MMS capable phones will be delivered as a text message instructing the recipient on how to view the message online.

Mobile Web (Data)*

The Mobile Web or Data provides you with Internet Access on your mobile device. Use of this feature requires a Data compatible phone as well as the appropriate Data Feature on your Feel Safe Wireless account. Please note, although you may attempt to view any webpage using your mobile phone, not all websites are formatted for mobile devices. You may experience delays as well as the inability to access certain websites when using the internet on your mobile phone.

*A \$10 or \$20 Feel Safe Wireless Refill card and a Compatible handset are required to use these features.

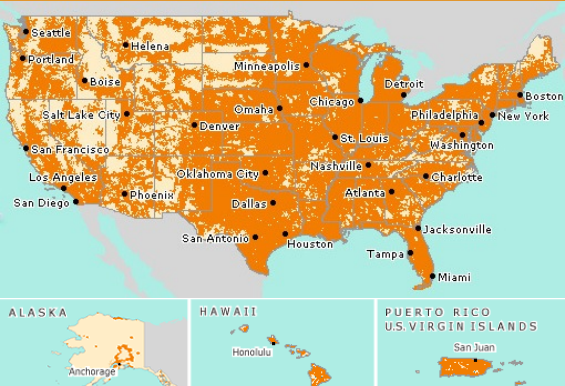
Feel Safe Wireless Terms of Service

1) Service Availability: Service is available only if you are within the Feel Safe Wireless GSM coverage area. Service may be interrupted due to system capacity limitations and system repairs or modifications. Service is subject to limitation or interruption caused by weather, terrain, obstructions such as trees or buildings and other conditions. Feel Safe Wireless is not responsible for time lost or days lost for interruption of service caused by above mentioned. There will be no credits or refunds issued for any reason. 2) Use of Device: Only Certified & Approved Unlocked 850/1900 MHz GSM phones are compatible with Feel Safe Wireless service. 3) Right to Terminate Service: We reserve the right to cancel, interrupt or restrict service to your number, without notice if we suspect fraudulent, illegal or abusive activity, abnormally high amounts of usage, failure to maintain an appropriate account balance for applicable charges, for harassing our employees and/or harassing other Airvoice customers. Some examples of fraudulent activity include Traffic Pumping and Spam Messaging. We reserve the right to cancel accounts for fraudulent activity based on voice calls, SMS, MMS and data usage. 4) Release of information: Feel Safe Wireless may release information about your account when we believe release is appropriate to comply with the law (i.e. subpoena, court order, E911 information, etc.). There will be no call histories released to customers for any reason. 5) PUK Codes: Please contact our US based customer service at 1-877-247-7799 if your phone asks for a PUK code. Do not attempt guessing any codes because it will disable your SIM card 6) Phone Codes: If your phone is asking for ANY codes you are not aware of, do not attempt guessing any codes because it may disable your SIM card. You will need a new Non-Active Feel Safe Wireless SIM card if you disable your SIM card. 7) Account Information: Any person that is able to verify your mobile number, SIM card number and/or account information is authorized by you to make changes to your account. 8) Ability to change services: You will have the ability to change from one Feel Safe Wireless rate plan to another upon request if proper verification is provided. Please contact our US based customer service at 1-877-247-7799. 9) Cancellation Policy: Cancellation requests should be put in writing, faxed to (248) 239-0182. You will lose any remaining airtime on your account. Feel Safe Wireless will not provide a refund or credit for any remaining airtime lost. 10) Porting Policy: You are able to port your number out of Feel Safe Wireless to other carriers. Feel Safe Wireless does not guarantee that number transfers to or from our company will be successful. If you request to port your number out to another company, that is considered a request by you to us to terminate all of the services associated with that number. Your remaining airtime will be forfeited and you will not receive a credit for the remaining balance. Feel Safe Wireless will not release your wireless number to another carrier without proper verification. If you are attempting to change service providers, you will need to verify your four-digit pin as well as your Feel Safe Wireless SIM card number, which is your account number, in order to transfer your account. Your account must be in an active status in order to port out. 11) Charges: You will be billed regular airtime charges for calls made to 800, 866, 877, 888 and all other toll free calls. Domestic long distance calls will be billed at regular airtime charges. Calls to international numbers will be billed at a higher rate (call customer service for rates). For all calls, the length of the call will be measured during the time that you are connected to our system, which is approximately from the time you press "SEND" or other key to begin a call until approximately the time you press "END" key to terminate the call. Airtime usage on each call is deducted in full minute increments, with partial minutes of use rounded up to the next full minute. Unanswered calls lasting 30 seconds or more will be charged standard airtime and rounded up to the nearest minute. Features such as call waiting, 3-way calling, call forwarding and voicemail will incur applicable airtime charges. 12) Account Balance: All calls will be automatically deducted from your account balance. Balances are not transferable or refundable. Airtime cannot be moved from one phone number to another phone number. You should take reasonable efforts to safeguard your phone and Refill airtime cards. Refill Airtime expires "X" amount of days after a refill card is added to your account whether you use the airtime or not. 13) Use of Service/Rates: International rates vary and are subject to change without notice. It is always best to contact customer service for up to date rates and available countries. You cannot use our service to place calls to numbers that begin with 500, 700, 855, 900 or 976. You cannot use the service to place operator assisted calls such as third party billed, and collect calls. If you are unable to successfully place a call out, attempt dialing with 1 + the area code + the 7-digit number. It is highly recommended that you power cycle your phone at least once per day to help re-register our phone within the Network. 14) Disputes: All disputes must be submitted within 30 days. Feel Safe Wireless is not responsible for disputes that occurred more than 30 days from the date of the dispute. 15) Multimedia Messaging: Multimedia Messaging service is an optional feature available to Feel Safe Wireless customers if a Feel Safe Wireless Refill card is added. This service will only work if used with a compatible handset and proper Feel Safe Wireless MMS configuration settings. Customers without MMS capable handsets will not receive credit for inability to send/receive multimedia messages. You should verify that your phone is MMS compatible before using this feature. Any Multimedia Message you attempt to send or receive will deduct 20 cents from your account balance, whether it is successfully delivered or not. You may attempt to download ringtones and games via Multimedia messaging. Feel Safe Wireless is not responsible if you are unable to download, or save ringtones, games, or other multimedia content to your wireless device. You will still be charged a multimedia message if you receive an MMS, but are not able to save the content to your phone. Feel Safe Wireless will not issue any credits for this reason. You will have the ability to

National Coverage Map

Our coverage area may expand.

Please contact customer service at 1-877-247-7799 or visit www.FeelSafeWireless.com for the most up to date coverage area information.



Prepaid Coverage Legend

- National Prepaid Coverage
- No Service Available

Important Information About the Coverage Map

This map shows approximately where our wireless coverage is available. Cellular service may be affected by such things as terrain, weather, foliage, building structures and your equipment. The map does not guarantee service availability.

send and receive MMS messages as a combination of text, photos, animations, video or sound on compatible handsets. Not all MMS handsets support all features of the service. MMS customers cannot send and receive messages in MMS format with other mobile customers who do not have an MMS compatible handset and/or are not activated. If a Feel Safe Wireless MMS message is sent to a mobile handset that cannot receive the message in MMS format, the recipient will need to have an SMS compatible handset and Service to receive this message. The recipient can access the message via the website for up to 7 days before deletion. Please note, you will still be charged an MMS message even if the recipient does not have MMS. There may be a delay between when a message is sent and when it is received. Feel Safe Wireless accepts no liability for any loss or damage as a result or a delay in receiving a message, a message not being secure or non delivery of a sent message. Recipients of your sent message must be within the coverage of their participating supplier's mobile network to receive a Multimedia message. If a recipient's phone is turned off, or out of their coverage area, the multimedia message is still considered sent, and you will still be charged 20 cents for the message. 16) Mobile Web/Data: Mobile Web or Data service is an optional feature available to Feel Safe Wireless customers if a Feel Safe Wireless Refill Card is added. This service will only work on compatible handsets that offer a web browser and handsets that are properly configured with Feel Safe Wireless data settings. It is your responsibility to ensure that your device is data capable. Data is measured and billed per KB, at \$0.000325/KB. There are 1024 KB in one MB of data. Using one full MB of data will result in a \$0.33 data charge. A data session consists from the time you access the internet via the mobile device until you terminate the session. Multiple sessions can be initiated within a 24 hour period; each will be charged per KB you use, and billed as separate events. You are responsible for ending each data session. If you fail to end a session, the internet will still be considered connected on your device, and your account bill still be charged \$0.000325/KB. Failure to log off of the internet will result in depletion of your airtime. Feel Safe Wireless will NOT issue credits for this reason. You may attempt to download ringtones and games via the Mobile Web. Feel Safe Wireless is not responsible if you are unable to download, or save ringtones, games or other multimedia content to your wireless devices. You will still be charged for data used when attempting to load certain websites, especially those that are not formatted for wireless devices, or contain high graphic content. Feel Safe Wireless is not responsible for slow loading time when using data services, and will not issue credits for this reason.

* All Information is subject to change at any time with or without notification. Because of frequent network upgrades, sometimes rates and other information may change. It is best to call our U.S. based customer service at 1-877-247-7799 or visit our website www.FeelSafeWireless.com for up to date information.

FEELSAFE WIRELESS

Brought to you by 
AIRVOICE
wireless



FREE PHONE!

LIMIT ONE LIFELINE PHONE PER HOUSEHOLD
(Either Wireline or Wireless Service)

250 FREE

minutes every month

AVAILABLE FEATURES

- 911/E911 Access
- Voicemail Account
- Caller ID
- Call Waiting
- 3 Way Calling
- Text Messaging
- Call Forwarding
- Free Calls to Customer Service

On The Most Reliable GSM Network

1-877-247-7799

FeelSafeWireless.com

QUALIFYING for FEEL SAFE

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Medicaid

Federal Public Housing Assistance- Section 8

National School Free Lunch Program

Bureau of Indian Affairs Programs

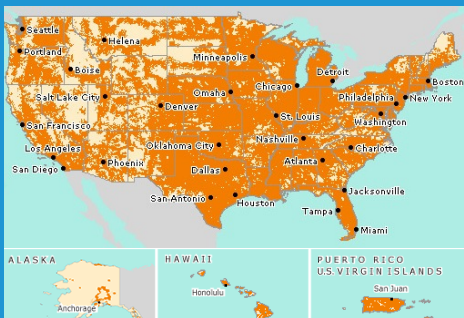
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Temporary Assistance to Needy Families- TANF

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- National Prepaid Coverage
- No Service Available

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EXHIBIT “I”

AFFIDAVIT AND CERTIFICATION

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

IN RE:

**APPLICATION OF AIR VOICE WIRELESS
LLCd/b/a FEELSAFEWIRELESS FOR
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN
THE STATE OF SOUTH CAROLINA**

DOCKET NO. _____

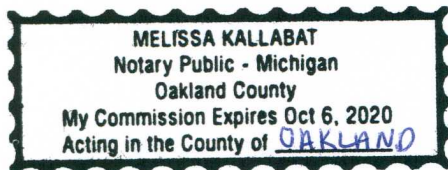
AFFIDAVIT AND CERTIFICATION OF JIM BAHRI

Personally appeared before me Jim Bahri, who, being first duly sworn, deposes and states the following:

1. My name is Jim Bahri; I am employed by Air Voice Wireless, LLC, ("Air Voice") as Chief Executive Officer. My business address is 2425 Franklin Road, Bloomfield Hills, MI 48302
2. This affidavit is given in support of the application to designate Air Voice as an eligible telecommunications carrier. I am an officer of the Company and am authorized to give this Affidavit on its behalf, and it is based on my personal knowledge.
3. On behalf of Air Voice, I certify and assert the following:
 - a. I have read Air Voice's petition for designation as an eligible telecommunications carrier and confirm the information contained therein to be true and correct to the best of my knowledge;
 - b. Air Voice will provide Lifeline service in a timely manner throughout the designated service area upon reasonable request of an eligible customer;

- c. Air Voice acknowledges that the Federal Communications Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area;
- d. Air Voice Wireless will offer the services that are supported by the federal universal service support mechanisms by using resale of another carrier's services;
- e. Air Voice will advertise in a media of general distribution the availability of such services, including lifeline services and the applicable charges; and
- f. Air Voice will provide service within a reasonable period of time, if the potential customer is within its licensed service area but outside its existing network coverage, if service can be provided at reasonable costs.
- g. Air Voice will comply with the federal and state annual reporting requirements.
- h. If the designations sought herein are granted, Air Voice will be supporting Universal Service in South Carolina based on its total South Carolina retail end user revenues, and will pay the annual assessment required by S.C. Code Ann. § 58-3-100.
- i. Air Voice will comply with CTIA's Consumer Code for Wireless Service.

Dated this 13 day of August, 2014.



AIR VOICE WIRELESS, LLC

By: Jim Bahri
Its: Chief Executive Officer

SUBSCRIBED and sworn to before me
this 13th day of Aug, 2014

Melissa Kallabat
Notary Public for OAKLAND COUNTY

My Commission Expires: OCT 6, 2020